

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1487

Public Comment 1156. Individual. HENRY PARADIS. 7-4-18

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## Submitter Information

**Name:** HENRY PARADIS

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## General Comment

Save the world, limit the guns sold!

# PUBLIC SUBMISSION

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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1488

Public Comment 1157. Individual. Emma Bradshaw. 7-4-18

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## Submitter Information

**Name:** Emma Bradshaw

**Address:**

2868 Valley Forge Road  
Lisle, IL, 60532

**Email:** emmabradshaw@comcast.net

**Phone:** 6309612868

**Fax:** 60532

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## General Comment

Control of firearms, guns, ammunition, and related articles continue to warrant control under the USML. Keep the U.S.

State Department in control, not the Department of Commerce. Thank you.



# PUBLIC SUBMISSION

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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1489

Public Comment 1158. Individual. Helen Yeomans. 7-4-18

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## Submitter Information

**Name:** Helen Yeomans

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## General Comment

No gun sales without security check!

# PUBLIC SUBMISSION

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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1490

Public Comment 1159. Individual. Judith Greenberg. 7-4-18

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## Submitter Information

**Name:** Judith Greenberg

**Address:**

1800 Clairmont Lake Unit 101

Decatur, GA, 30033

**Email:** jgreenb@bellsouth.net

**Phone:** 4043251504

**Fax:** 30033

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## General Comment

I oppose this rule change that would switch regulation of firearms from the U.S. State Department to the U.S. Commerce Dept.

# PUBLIC SUBMISSION

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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1551

Public Comment 1160. Individual. Rochelle La Frinere. 7-4-18

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## Submitter Information

**Name:** Rochelle La Frinere

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## General Comment

The regulation of firearms export must remain with the State department, not Commerce.

# PUBLIC SUBMISSION

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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1553

Public Comment 1161. Individual. Mike M. 7-4-18

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## Submitter Information

**Name:** Mike M

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## General Comment

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

[1] Trump move would make it easier for U.S. gun manufacturers to export firearms, The Washington Times, May 14, 2018.

[2] Trump wants to make foreign arms sales easier, The Boston Globe, June 23, 2018.

[3] Ibid., The Boston Globe

[4] American Guns Drive the Migrant Crisis That Trump Wants to Fix With a Wall, The Trace, May 25, 2017.

[5] The Trump administration proposes making gun exports easier. Heres how to submit your public comment on this dangerous proposal, Violence Policy Center.

[6] Ibid., Violence Policy Center.

[7] "U.S. requires group to remove 3-D gun instructions from its website," CNN.com, May 13, 2013.

# PUBLIC SUBMISSION

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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1555

Public Comment 1162. Individual. Shari Draayer. 7-4-18

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## Submitter Information

**Name:** Shari Draayer

**Address:**

437 W Valley Forge Rd  
King Of Prussia, 19406

**Email:** shari.draayer@eastern.edu

**Phone:** 2158696249

**Fax:** 19406

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## General Comment

I am writing to you to formally oppose this dangerous rule change switching the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are dangerous; they are intended to be deadly. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. In a sane and just world they would be subject to more controls, not less! Forget making America great again; could we make it sane and just first?!

# PUBLIC SUBMISSION

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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1557

Public Comment 1163. Individual. Laura Meisler. 7-4-18

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## Submitter Information

**Name:** Laura Meisler

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## General Comment

I oppose switching regulation of sales of firearms from the State Department to the Commerce Department. Do not make this proposed change!

# PUBLIC SUBMISSION

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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1558

Public Comment 1164. Individual. Sybil Schlesinger. 7-4-18

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## Submitter Information

**Name:** Sybil Schlesinger

**Address:**

22 Rockland Street  
Natick, MA, 01760

**Email:** sybil.sch@gmail.com

**Phone:** 5084048192

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## General Comment

Please do not enact this rule change. This proposed rule change eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

There are enough weapons in the world now. We do not need to enrich gun manufacturers at the expense of all the rest of humanity. Do not change this rule.



# PUBLIC SUBMISSION

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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1560

Public Comment 1165. Individual. John McAllister. 7-4-18

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## Submitter Information

**Name:** John McAllister

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## General Comment

I am against the transfer of control of international firearms sales to the Commerce Department Bureau of Industry and Security. To do so would needlessly endanger the international community with lack of appropriate regulation.J

# PUBLIC SUBMISSION

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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1562

Public Comment 1166. Individual. Linda Curtin. 7-4-18

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## Submitter Information

**Name:** Linda Curtin

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## General Comment

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1565

Public Comment 1167. Individual. Judith Fardig. 7-4-18

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## Submitter Information

**Name:** Judith Fardig

**Address:**

1066 SW Westwood Dr

Portland, 97239-2747

**Email:** pjfardig@comcast.net

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## General Comment

I am a retired nurse-midwife, very concerned about the public health impacts in the U.S. and globally of too many guns in the hands of dangerous people. Let's not export our lethal problem to other countries.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migrations.

Keep the regulation in the State Department with stronger safeguards and a history of trained personnel to enforce them.

The N.R.A. is becoming a toxic brand, so they are looking to develop a new money stream for U.S. guns and ammunition manufacturers. Do not be cowed by their pressure.

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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1567

Public Comment 1168. Individual. Philip Tobias. 7-4-18

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## Submitter Information

**Name:** Philip Tobias

**Address:**

1750 30th St. #603  
Boulder, CO, 80301

**Email:** philtobias@aol.com

**Organization:** Philip Tobias Enterprises (and various clients or other companies)

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## General Comment

Please reject the proposed rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Firearms have caused the deaths of several people I knew, in several different incidents. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Switching regulation of gun exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration, such as our country is currently experiencing on our southern border.

To protect human safety and societal stability, please reject this rule change.

Thank you.

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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1568

Public Comment 1169. Individual. Lynn Mignola. 7-4-18

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## Submitter Information

**Name:** Lynn Mignola

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## General Comment

I oppose any rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. A rule change like this would increase the likelihood of large weapons caches getting into the hands of violent and dangerous agents and decrease safeguards for American Citizens. Arms sales are not about commerce and should not be treated as such.

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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1569

Public Comment 1170. Individual. Pauline Alama. 7-4-18

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## Submitter Information

**Name:** Pauline Alama

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## General Comment

I oppose this rule change, which would transfer the regulation of firearms export from the U.S. State Department to the U.S. Commerce Department. I don't want my country to be the arms dealer to the world. What the world needs now is not more guns. More guns going around the world, possibly getting in the hands of terrorists, do not make our country or our world safer.

# PUBLIC SUBMISSION

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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1570

Public Comment 1171. Individual. William Larson. 7-4-18

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## Submitter Information

**Name:** William Larson

**Address:**

304 A N Hillcrest Dr  
Goldsboro, NC, 27534-4332

**Email:** larson266@aol.com

**Phone:** 9197509592

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## General Comment

The sale of firearms should remain with the US Department of State. There is too big a risk that weapons could fall into the hands of terrorists. The US Department of State is better equipped to vet where and to who these weapons are sold.

# PUBLIC SUBMISSION

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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1571

Public Comment 1172. Individual. Jessica Donato. 7-4-18

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## Submitter Information

**Name:** Jessica Donato

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## General Comment

I am writing to you because I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.



# PUBLIC SUBMISSION

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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1572

Public Comment 1173. Individual. Joan Farber. 7-4-18

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## Submitter Information

**Name:** Joan Farber

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## General Comment

I am writing in opposition to the proposed change in regulations regarding the export of firearms. I believe that this change endangers this country in serious ways. My concerns are as follows:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

I believe that in the interest of national security we must not change the existing regulations.

Yours truly,  
Joan C. Farber, Ph.D.

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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1573

Public Comment 1174. Individual. Gania Barlow. 7-4-18

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## Submitter Information

**Name:** Gania Barlow

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The rule change would make the world a far more dangerous place.

# PUBLIC SUBMISSION

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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1574

Public Comment 1175. Individual. LORI BUNTON. 7-4-18

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## Submitter Information

**Name:** LORI BUNTON

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. This new regulation is wrong and dangerous not only for U.S. national security but for global security as we know that the greed of firearm manufacturers will surely trump their aversion to selling arms to dangerous countries.

# PUBLIC SUBMISSION

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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1575

Public Comment 1176. Individual. Douglas Godfrey. 7-4-18

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## Submitter Information

**Name:** Douglas Godfrey

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## General Comment

I oppose this or any other rule change that would transfer authority to grant licenses for the export of firearms from the U.S. State Department to the U.S. Commerce Department.

Firearms in international trade are used as weapons of war. Neither the US State Department, nor the US Commerce Department should not be in the business or promoting War.

The United States should not be exporting our problems with automatic and semi-automatic weapons to the rest of the world.

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1576

Public Comment 1177. Individual. Linda Murphy. 7-4-18

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## Submitter Information

**Name:** Linda Murphy

**Address:**

Hyattsville, MD, 20782

**Email:** linda56k@verizon.net

**Phone:** 3012776544

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would make it easier for the export of firearms to oppressive regimes; it would remove safeguards that help keep organized crime and terrorist organizations from obtaining weapons; it would increase the kind of violence that destabilizes countries and causes mass migration, which is already occurring at alarming rates due to wars, and criminal gang activity.

The rule change would eliminate the State Departments Blue Lantern program, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. This would be devastating to civilian populations.

The rule change would remove: (1) the licensing requirements for brokers, expanding the risk of trafficking; (2) the blocking ability of the State Department on the 3D printing of firearms. Without this capability, the State Department would lose an important tool for charging individuals, who use 3D printers to print firearms, with violating arms export laws. The rule switch would remove this block, and expose civilians everywhere to an exponentially larger risk of dying from the expanded use of these lethal weapons.

Please do NOT make this rule change, which will endanger innocent people's lives worldwide.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 12:49 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9432-znjn
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1577

Public Comment 1178. Individual. Victoria DeSarno. 7-4-18

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## Submitter Information

**Name:** Victoria DeSarno

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## General Comment

I oppose the rule change that would switch the control of weapons from the State Department to the Commerce Department

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 12:50 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9432-ebiu
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1578

Public Comment 1179. Individual. christine maciel. 7-4-18

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## Submitter Information

**Name:** christine maciel

**Address:**

258 riley road  
new windsor,, 12553

**Email:** ticketpockets@gmail.com

**Phone:** 8455646972

**Fax:** 12553

---

## General Comment

Please do not accept the regulation of firearm exports to be changed from the State Department to the Commerce Dept.

This kind of business requires oversight from Congress, our elected representatives. The exports of firearms is too important to be considered just commerce, there are dangerous consequences to exporting firearms; we cannot consider this 'business as usual'. Oversight is required. No change!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 12:51 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9432-84ys
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1579

Public Comment 1180. Individual. Timothy Bailey. 7-4-18

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## Submitter Information

**Name:** Timothy Bailey

**Address:**

P.O.Box 261

John Day, OR, 97845

**Email:** ktsk@ortelco.net

**Phone:** (541) 792-0569

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## General Comment

I strongly oppose this rule change that would change the regulations of firearms export from U.S. State Department to U.S.Commerce Department.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 12:51 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-mg7k
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1580

Public Comment 1181. Individual. Lyn Bober. 7-4-18

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## Submitter Information

**Name:** Lyn Bober

**Address:**

500 N.Portahe Path  
Akron, OH, 44303-1222

**Email:** lynbober@aol.com

**Phone:** 3307014421

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## General Comment

I am very concerned about this. I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The safety of our country, its people AND the world, depends upon keeping this under the governance & control of our State Department. Thank you for your consideration.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 12:52 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-3t9x
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1581

Public Comment 1182. Individual. Marge Schwartz. 7-4-18

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## Submitter Information

**Name:** Marge Schwartz

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## General Comment

Gun sales should remain under the Jurisdiction of the State Dept. The Commerce Dept. would enable guns to be sold to enemies of the U.S. because their job is to promote sales.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 12:56 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-hvki
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1585

Public Comment 1183. Individual. E Luckring. 7-4-18

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## Submitter Information

**Name:** E Luckring

**Address:**

3641 Lavell Drive  
Los Angeles, CA, 90065

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## General Comment

I oppose the proposed rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

I believe firearms exports should stay under the regulation of the State Department and that Congress should have the power to block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it might see reason to stop in the name of national security, or to prohibit sales to countries where there are serious human rights concerns.

Moreover, the Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

This proposed change would make our country less safe by fueling terrorism and organized crime around the world.

Please keep firearms exports under the regulation of the State Department.

Thank You,

Eve Luckring  
3641 Lavell Drive

Los Angeles, CA 90065

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 12:57 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-kbzi
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1587

Public Comment 1184. Individual. karyn barry. 7-4-18

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## Submitter Information

**Name:** karyn barry

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## General Comment

I STRONGLY oppose the switching of firearms exports from the State Department to the Commerce Department!

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

We do not need to PROFIT from the selling of guns around the world!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 12:59 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-zq4s
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1589

Public Comment 1185. Individual. James Melloh. 7-4-18

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## Submitter Information

**Name:** James Melloh

**Address:**

S Portland, ME, 04106

**Email:** jmelloh@roadrunner.com

**Phone:** 2077862346

**Organization:** maine psr

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Weapons of war, now used to massacre children in our country, should not be sold for profit overseas. This in now way makes us more secure. It makes us sorry souls who would sell the lives of children for profit.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 12:59 PM
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-e9ng
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1590

Public Comment 1186. Anonymous. 7-4-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am very much opposed to this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you for considering the safety of the citizens and not the profits of the gun industry.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 1:00 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-ulwo
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1592

Public Comment 1187. Individual. Nancy Chismar. 7-4-18

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## Submitter Information

**Name:** Nancy Chismar

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## General Comment

A rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business) would open new floodgates for arms sales internationally, with serious implications for our national security. This is NOT acceptable.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 1:01 PM
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<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-zfe0
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1594

Public Comment 1188. Individual. Thomasin Willard. 7-4-18

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## Submitter Information

**Name:** Thomasin Willard

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## General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Please keep these regulations under the authority of the State Department - the proposed rule change benefits the NRA and arms profiteers, and no one else.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 1:01 PM
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-zt8i
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1595

Public Comment 1189. Individual. Ursula Cohrs. 7-4-18

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## Submitter Information

**Name:** Ursula Cohrs

**Address:**

PO Box 40065

Bay Village, OH, 44140

**Email:** ursulacohrs@gmail.com

**Phone:** 4408350355

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## General Comment

I m writing because I am against moving the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department which is focused on safeguarding our nation, to the U.S. Commerce Department which is focused on promoting American business.

This transfer of authority would open floodgates for arms sales internationally, with serious implications for our national security.

- It would eliminate the State Departments Blue Lantern program (in place since 1940) which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- It would also remove licensing requirements for brokers, increasing the risk of trafficking.
- And it would remove the State Departments block on the 3D printing of firearms.

As an example to the last comment: When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

We all know that firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations.

This is why fireamrs should be subject to more controls, not less!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 1:02 PM
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<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-njqg
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1596

Public Comment 1190. Individual. James Klein. 7-4-18

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## Submitter Information

**Name:** James Klein

**Address:**

3501 Monterrey St.  
Corpus Christi, 78411

**Email:** jeklein64@yahoo.com

**Phone:** 361-334-3908

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## General Comment

I strongly Oppose a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would make the world a far more dangerous place.

Common sense gun safety measures, like numerous other issues (climate change, food labeling, immigration reform, prison reform, education reform, short-term lending regulation, healthcare reform, banking regulation, opioid regulation) remains a vexing problem primarily due to corporations' ability to curry favor with elected officials. The corrupting influence of money in our political system is undermining our democratic traditions and discouraging Americans from voting and/or running for office. This ominous development may well end our experiment in representative democracy unless we alter this decades-long trend. For the sake of the republic, we must amend the US Constitution to state that corporations are not people (and do not have constitutional rights) and money is not speech (and thus can be regulated by state and/or federal campaign finance laws). Short of accomplishing this, no other reform of significance will be achieved. The moneyed interests will turn any reform to their benefit, often at the expense of the nation as a whole.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 1:04 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-tphs
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1597

Public Comment 1191. Individual. Cindy Ware. 7-4-18

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## Submitter Information

**Name:** Cindy Ware

**Address:**

5100 Peyton Chapel

Haymarket, 20169

**Email:** sheltiemom47@gmail.com

**Phone:** 919-360-0546

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## General Comment

I oppose this rule change that would switch the regulation of firearms export from the US State Dept. to to US Commerce Dept.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 1:06 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-5uth
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1598

Public Comment 1192. Individual. Therese Wilson. 7-4-18

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## Submitter Information

**Name:** Therese Wilson

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## General Comment

I am writing to say that I am absolutely opposed to the rule change that would transfer the regulation of firearms export licenses of semiautomatic weapons and other powerful weapons from the State Department to the Department of Commerce. Congressional oversight of the movement of these weapons must remain intact and be strengthened. We need more oversight, not less! This rule change could mean that congress is no longer automatically informed about sizeable weapons sales that it could stop in the interest of national security, even to countries where there are serious human rights issues.

The Department of Commerce lacks the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have the staff it would need for this important work. It is completely unacceptable to me that firearms traffickers, organized crime, terrorist organizations and other violent, dangerous agents would have their way facilitated by a lack of vigilance on our part.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 3:43 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-s99e
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1620

Public Comment 1193. Individual. Kimberly Thompson. 7-4-18

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## Submitter Information

**Name:** Kimberly Thompson

**Address:**

6400 Christie Ave.#5302

Emeryville, 94608-1047

**Email:** kmt6401@yahoo.com

**Phone:** 5104200917

**Fax:** 94608

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## General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. President Trump and his administration don't seem to care about America's standing with other countries or preserving life and health of anyone who's not a billionaire. America needs to remain a safe, diverse country to keep functioning.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 3:44 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1621

Public Comment 1194. Individual. Karen Cohen. 7-4-18

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## Submitter Information

**Name:** Karen Cohen

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## General Comment

My family and I have just learned the the NRA is lobbying to move regulations of sales from US gun manufacturers from this Department to that of Commerce Dept. This UTTERLY UNACCEPTABLE!

No other nation in the world has a civilian population that is armed as ours is here. Who are the customers for these weapons? Terrorists, paramilitary groups and criminals. Will US weapons be used to kill our own military personnel? To kill our allies and friends? To kill vulnerable population groups? To kill American tourists? Without a doubt!

Putting regulation of weapons sales in the hands of Commerce is a complete renunciation of every effort to control the flow of weapons that can and will be used against Americans ( and other humans)! This is such insanity, it crossed the line to treason, as it aids and abets the enemies of the United States of America.

You must use everything in your power to stop this descent into chaos.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 3:45 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-8msg
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1622

Public Comment 1195. Individual. Damon Mills. 7-4-18

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## Submitter Information

**Name:** Damon Mills

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## General Comment

The state department should continue the regulation of fire arms exports. I am against the department of commerce handling this important and supposedly secure job.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 3:46 PM
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<b>Posted:</b> July 17, 2018
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<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1623

Public Comment 1196. Individual. Suzy Clarkson Holstein. 7-4-18

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## Submitter Information

**Name:** Suzy Clarkson Holstein

**Address:**

Shorewood, WI, 53211

**Email:** clarkson@wi.rr.com

**Phone:** 4143323517

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## General Comment

I oppose the rule change which would put international fire arms sales under the jurisdiction of the Commerce Department. In an era when we are concerned about terrorism and weapons availability, it seems very wrong to move gun sales into a sphere where buying and selling would be the chief concern rather than national security. Please leave arms sales under the oversight of Defense.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 3:47 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-ntp8
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1624

Public Comment 1197. Individual. Gary Korengel. 7-4-18

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## Submitter Information

**Name:** Gary Korengel

**Address:**

13921 Raie Ave  
Hudson, FL, 34667

**Email:** garydkorengel@yahoo.com

**Phone:** 727-378-7169

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## General Comment

Do not transfer the responsibility of regulating and approving the export of US guns to the US Department of Commerce.

Company's goals are to increase sales and shareholder dividends, not screen if their weapons are being shipped to Terrorist Nations or Terrorist Organizations.

The US Department of State is much better equipped to assure that US guns are not used in the future against US Soldiers and Citizens.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 3:47 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-9dsk
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1625

Public Comment 1198. Individual. Frank Wissler. 7-4-18

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## Submitter Information

**Name:** Frank Wissler

**Address:**

695 Hillcrest Trl

Spring Branch, TX, 78070

**Email:** destinys1stmate@hotmail.com

**Phone:** 2108704010

**Organization:** 695 Hillcrest Trl

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## General Comment

The president is wrong. Again. He is pandering to weapons manufacturers because fascism believes corporate profits trump (pun intended) everything else. Including the security of the nation. Less control over arms sent to questionable locations (Mexico anyone?) results in those arms being used against Americans. There are important issues to be resolved in this country and this one is so far from the top it doesn't deserve any consideration.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 3:48 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-7xoa
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1626

Public Comment 1199. Individual. James Krist. 7-4-18

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## Submitter Information

**Name:** James Krist

**Address:**

1420 Gilbert Rd

Arnold, 21012

**Email:** jtkrist@gmail.com

**Phone:** 410-212-4585

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. THE US SHOULD NOT BE EXPORTING MILITARY FIREARMS!!!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 3:49 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-pkj
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1627

Public Comment 1200. Individual. Jessica Livingston. 7-4-18

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## Submitter Information

**Name:** Jessica Livingston

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## General Comment

Keep firearms classified as "military" to keep Americans safe. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 3:51 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-sd9v
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1628

Public Comment 1201. Anonymous. 7-4-18

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## Submitter Information

**Name:** anonymous Anonymous

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## General Comment

There should be no transfer from the US State Dept. to the US Commerce Dept. of the regulation and supervision of firearms exports.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 3:51 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-r45r
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1629

Public Comment 1202. Individual. Brad Johnson. 7-4-18

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## Submitter Information

**Name:** Brad Johnson

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## General Comment

This is horrible. The consequences will be dire.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 3:52 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-uzk1
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1630

Public Comment 1203. Individual. Cheryl Ritch. 7-4-18

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## Submitter Information

**Name:** Cheryl Ritch

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I do not believe that this proposed change is in the best interest of the people of this country or the people in the world at large.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 3:53 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-7fjl
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1631

Public Comment 1204. Individual. Kim Kensler-Prager. 7-4-18

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## Submitter Information

**Name:** Kim Kensler-Prager

**Address:**

2700 PELHAM RD

Apt 320

Toledo, 43606

**Email:** kkensler@msn.com

**Phone:** 4194918268

**Fax:** 43606

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We need gun safety in our country not pandering to the NRA.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 3:53 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-dono
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1632

Public Comment 1205. Individual. Pamela Elliott. 7-4-18

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## Submitter Information

**Name:** Pamela Elliott

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## General Comment

The control of firearm sales should always be under the warrant control of USML and never Commerce department. These are not toys or produce. These are military weapons of death and destruction never meant to be out of the hands of the military! The regulations on sales need to be kept as is and tightened even more per states so we have a trail of each weapon sold by whom.

I do not agree with changing the control of firearms, guns, ammunition & related articles like the President wants to in this rule!

Selling guns like candy to the highest bidder! OMG!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 3:54 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-v0kp
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1633

Public Comment 1206. Individual. Ruth Neifeld. 7-4-18

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## Submitter Information

**Name:** Ruth Neifeld

**Address:**

7218 Lincoln Drive

Phila., PA, 19119

**Email:** jacneif@gmail.com

**Phone:** 215-247-8608

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## General Comment

I am writing to express my strong opposition to the proposal that firearms exports be moved from the US State Department to the Commerce Department. These sales should be closely monitored; weaponry should not be regarded as exports like wheat or autos.

Thanks for your consideration.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 3:55 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-fedf
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1634

Public Comment 1207. Individual. Patricia Copenhaver. 7-4-18

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## Submitter Information

**Name:** Patricia Copenhaver

**Address:**

710 Union St.

Iowa Falls, IA, 50126

**Email:** patcope@ymail.com

**Phone:** 641-640-0754

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S> Commerce Department, which does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

In addition, this rule change would mean that Congress would no longer be able to watch for guns going to countries guilty of human rights violations. This is something that Commerce, frankly, would not especially care about. They would only care about sales.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 3:56 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-4ghq
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1635

Public Comment 1208. Individual. Janet Anonymous. 7-4-18

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## Submitter Information

**Name:** Janet Anonymous

**Address:** United States,

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## General Comment

As a concerned American and member of the world's human race, I urge you to do whatever is necessary to reject the move of international sale of American firearms to your department. Your goal is to increase access to the world for American business, and while it is a worthy mission, to move weapon sales flips the focus from safety and peace to making money. This is where our wonderful capitalist system can easily run amok because, all too often, with money as a motivator, it's much easier for deals to be made that may not be in our country's - or the world's - best interests.

Please reject the pressures of the NRA and gun manufacturers and, instead, stand up for humanity rather than for money-making. Thank you for doing the right thing.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 3:57 PM
<b>Received:</b> July 04, 2018
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-8atl
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1636

Public Comment 1209. Individual. Lisa Holm. 7-4-18

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## Submitter Information

**Name:** Lisa Holm

**Address:**

143 Northpark Dr  
Vacaville, CA, 95688

**Email:** Lisah2olm@comcast.net

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## General Comment

I am writing to oppose the transfer of gun export permitting from the State Department to the Department of Commerce. State and Congress must continue its efforts to keep large scale gun sales out of the hands of tyrants, human rights abusers, and terrorists. Please support State retaining this important responsibility. Otherwise, Commerce will be complicit with the NRA and gun manufacturers in widespread violence, abuse, and terrorism around the world.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 3:58 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-9kn2
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1637

Public Comment 1210. Anonymous. 7-4-18

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## Submitter Information

**Name:** Anonymous Anonymous

**Address:**

17560 SW 29th Ct.  
Miramar, FL, 33029

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would also remove the State Departments block on the 3D printing of firearms. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 3:58 PM
<b>Received:</b> July 04, 2018
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9433-qh3f
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1638

Public Comment 1211. Individual. Steven Winston. 7-4-18

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## Submitter Information

**Name:** Steven Winston

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## General Comment

I'm a teacher. I was teaching 30 minutes away from Newtown, CT when the Sandy Hook massacre occurred. I had students who knew murdered first graders. There was an active shooter situation near a college campus 30 minutes from my current house this week in which a New York State Trooper was killed. The gun violence in this country needs to be reigned in. In the interests of National Security, arms regulations must be regulated by a department interested in national security, NOT commerce. Please, we are failing to protect our citizens from firearms badly enough as it is.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 3:59 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9434-2oey
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1639

Public Comment 1212. Individual. Janet Pecci. 7-4-18

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## Submitter Information

**Name:** Janet Pecci

**Address:**

3704 Swift Drive  
Raleigh, NC, 27606

**Email:** jpecci@att.net

**Phone:** 919-851-1112

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce. The proposed rule treats semi-automatic weapons as non-military when they are, in fact, used by the military. We need Congressional oversight for important gun export deals. The Commerce Department promotes trade at the expense of public safety.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:00 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9434-y0sn
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1640

Public Comment 1213. Individual. Beverly Railsback. 7-4-18

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## Submitter Information

**Name:** Beverly Railsback

**Address:**

103 N Franklin St  
Lambertville, NJ, 08530

**Email:** bdrailsback@yahoo.com

**Phone:** 6093972658

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## General Comment

I oppose this rule change which would switch the regulation of firearms exports from the US State Department to the US Department of Commerce. This would remove any congressional oversight of firearms exports and potentially allowing exports to dangerous foreign parties.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:01 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9434-gyp9
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1641

Public Comment 1214. Individual. Lily Lau-Enright. 7-4-18

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## Submitter Information

**Name:** Lily Lau-Enright

**Address:**

5321 Spilman Ave  
Sacramento, CA, 95819

**Email:** lilomama@gmail.com

**Phone:** 9164575818

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## General Comment

I oppose in the strongest voice this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Our world is already in an unsafe and perilous state with rampant uncontrolled gun violence here and abroad. Allow the State Dept to continue its authority to oversee the sale and transfer of firearms. Do not transfer this authority to the Dept of Commerce that has no experience with national security and does not have adequate staff to enforce these new functions. This rule change would hugely threaten the safety and security of our own country as well as internationally.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:02 PM
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<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9434-sqoo
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1642

Public Comment 1215. Individual. Amy Posner. 7-4-18

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## Submitter Information

**Name:** Amy Posner

**Address:**

2 Royat St  
Lido Beach, 11561

**Fax:** 11561

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## General Comment

To Whom It Concerns:

I oppose this rule switching the responsibility for regulatory oversight of firearms exports from the U.S. State Department to the U.S. Commerce Department. Diplomacy not weapons should be our chief export.

If the switch is made, the DOC will have to fulfill its charter to US businesses. Avoid having to aid the distribution of more weapons abroad! Imagine if we retained credibility to solve through diplomacy conflicts around the world. Not only have we been ceding that ground, but now will we increase our presence through even more weaponry? Is my beloved country becoming an evil empire? Please, please, please do not allow this change! Save yourselves from that burden!

Patriotically yours,

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:02 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9434-q1qw
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1643

Public Comment 1216. Individual. Katherine Slawinski. 7-4-18

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## Submitter Information

**Name:** Katherine Slawinski

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## General Comment

I am opposed to the rule change that would allow the management of export licenses to be regulated by the U.S. Commerce Department. This function should remain with the U.S. State Department, to discourage trade in high-powered firearms.

Thank You.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:03 PM
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<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9434-8srn
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1644

Public Comment 1217. Individual. Ann Rogers. 7-4-18

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## Submitter Information

**Name:** Ann Rogers

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## General Comment

This gives freedom to all who trade in guns, and will foster violence on both sides of the border. The drug war will never be one until we quit selling guns to Mexico, and reduce the violence involved.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:04 PM
<b>Received:</b> July 04, 2018
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9434-6i1m
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1645

Public Comment 1218. Individual. Gail Fleischaker. 7-4-18

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## Submitter Information

**Name:** Gail Fleischaker

**Address:**

62 W Pelham Rd

Shutesbury, MA, 01072

**Email:** gailfleil@gmail.com

**Phone:** 4132530565

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It is a naked attempt to allow greater export, hence greater production -- all for the interests of U.S. arms manufacturers and against the interests of U.S. safety and security.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:06 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9434-wda7
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1646

Public Comment 1219. Individual. Deborah Doane. 7-4-18

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## Submitter Information

**Name:** Deborah Doane

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## General Comment

Commerce Department.

You should not have control over the sale of firearms. The State Department will protect us against terrorism. We do not want to enable anti-American factions to arm themselves and attack us.

Don't do it!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:06 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9434-5rx3
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1647

Public Comment 1220. Individual. A.M. Hess. 7-4-18

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## Submitter Information

**Name:** A.M. Hess

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## General Comment

I oppose changing the rules to change regulations of firearms exports from the U.S. State Department to the U.S. Commerce Department. U.S. weapons already flood the globe, fueling deadly conflicts worldwide, and I do not want Commerce pushing weapons as a business interest. The State Department's job is protecting our country, and they need to oversee firearms exports in order to do so.

Keep firearms exports under the purview of the U.S. State Department. Thank you.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:07 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9434-o5qm
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1648

Public Comment 1221. Individual. Ann Thryft. 7-4-18

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## Submitter Information

**Name:** Ann Thryft

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. With this rule change, Congress would no longer be able to block sales of large batches of firearms to foreign countries, because it would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. The Commerce Department does not have the resources to adequately enforce export controls and its Bureau of Industry and Security does not have staff everywhere.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:08 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9434-s24g
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1649

Public Comment 1222. Individual. Karl Sklar. 7-4-18

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## Submitter Information

**Name:** Karl Sklar

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## General Comment

How incredibly immoral; do we stand for nothing but commerce any more? Were rapidly becoming a ghastly parody of banana republics; decency, responsibility, moral stature, going, going, gone, to the highest bidders.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:09 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9434-jors
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1650

Public Comment 1223. Anonymous. 7-4-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

This absolutely and incredibly absurd!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:09 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9434-ml48
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1651

Public Comment 1224. Individual. Karen Resciniti. 7-4-18

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## Submitter Information

**Name:** Karen Resciniti

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## General Comment

I am opposed to switching the regulation of firearms exports from the State Department to the Commerce Department because it would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and it would further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:10 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9434-fsn7
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1652

Public Comment 1225. Individual. Robert Handelsman. 7-4-18

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## Submitter Information

**Name:** Robert Handelsman

**Address:**

2643 Central Park  
Evanston, IL, 60201

**Email:** trtfmnlwr@aol.com

**Phone:** 847-491-1950

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## General Comment

Keep arms export licenses in the State Department



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:13 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9434-7ph8
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1653

Public Comment 1226. Individual. Dave Batten. 7-4-18

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## Submitter Information

**Name:** Dave Batten

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## General Comment

It would be a colossal mistake to treat firearms, particularly semi-automatic weapons, as commodity for export. Providing lethal weapons abroad requires thoughtful review and followup that should remain with the State Department. Let's not export violence to the world in the name of making a buck for weapons manufacturers.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:14 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9434-pbua
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1654

Public Comment 1227. Individual. Eve Gregg. 7-4-18

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## Submitter Information

**Name:** Eve Gregg

**Address:**

3307 Briarwood Ln  
Safety Harbor, 34695

**Email:** evefgregg@gmail.com

**Phone:** 7274176680

**Fax:** 34695

---

## General Comment

Why does the government allow itself to be bullied by the NRA?!?! Regulating arms sales is the job of the State department. Gun manufacturers already profit enough from guns terrorizing U.S. citizens--don't open new floodgates for arms sales internationally and further jeopardize our national security.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:15 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9434-8td5
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1655

Public Comment 1228. Individual. Elizabeth Milliken. 7-4-18

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## Submitter Information

**Name:** Elizabeth Milliken

**Address:**

1256 Hudson Avenue  
St. Helena, CA, 94574

**Email:** beth@spottswode.com

**Phone:** 7079638754

**Fax:** 94574

---

## General Comment

I write this to let you know that I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:16 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9434-jtqp
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1656

Public Comment 1229. Individual. Caitlin Johnston. 7-4-18

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## Submitter Information

**Name:** Caitlin Johnston

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## General Comment

I am against any change to the regulations governing the international sale/export/import of fire arms!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:16 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9434-4aev
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1657

Public Comment 1230. Individual. Robert Hanson. 7-4-18

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## Submitter Information

**Name:** Robert Hanson

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## General Comment

Let's work for a world with less guns...not more.

Please reject the proposed changes.

Bob Hanson, Professor-Emeritus  
San Diego State University

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:17 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9434-xlrh
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1659

Public Comment 1231. Individual. Mary Jane Engh. 7-4-18

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## Submitter Information

**Name:** Mary Jane Engh

**Address:**

PO Box 97

Garfield, WA, 99130

**Email:** enghmje@frontier.com

**Phone:** 5096351402

**Fax:** 99130

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## General Comment

I strongly oppose changing the control of arms exports from the State Department to the Commerce Department. This would deprive Congress and the State Department of the ability to prevent U.S. gun manufacturers from arming dictators, rebels, civil wars, criminals, and enemy regimes around the world, all in the name of profit.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:18 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9434-xugx
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1660

Public Comment 1232. Individual. Sr. Margaret Ann Arnold. 7-4-18

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## Submitter Information

**Name:** Sr. Margaret Ann Arnold

**Address:** United States,

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## General Comment

I oppose the rule change that would switch regulations of firearms from the US State Dept to the US Commerce Dept.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:19 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9434-1uoy
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1661

Public Comment 1233. Individual. Vanna Cleary. 7-4-18

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## Submitter Information

**Name:** Vanna Cleary

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## General Comment

I am totally against switching the regulation of gun sales and munitions to international buyers from the State Department to the Commerce Department. This move would make weapons of war just money-making opportunities for selected businessmen while substantially increasing the risk of war and death in the receiving countries. Guns and other munitions should not be made equivalent to clothing, farm implements and other exports. These exports kill people.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:19 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
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<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1662

Public Comment 1234. Individual. Raven Deerwater. 7-4-18

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## Submitter Information

**Name:** Raven Deerwater

**Address:**

PO Box 1786

Mendocino, CA, 95460

**Email:** raven@taxpractitioner.com

**Phone:** 7079371099

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## General Comment

On this Independence day, please do not shift the exporting of military grade firearms to the Commerce Department -- all it will do is fuel terrorism and make the world less safe. Do not trifle with US Security so gun manufacturers can get more sales.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:20 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9434-y5b2
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1663

Public Comment 1235. Individual. Jeannette Stokols. 7-4-18

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## Submitter Information

**Name:** Jeannette Stokols

**Address:**

1 Butler St

Irvine, CA, 92612-2724

**Email:** jstokols@gmail.com

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## General Comment

I strongly oppose any change in regulation of firearms from the State Department to the Commerce Department. There are so many countries and non-state actors that would take advantage of any laxity in this regulation and this could create more violence, chaos, repression in countries around the world. There is already enough violence in the world without making it even easier to enact it.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

All of the effects below would be highly detrimental to safety around the world and ultimately, hurtful as well for U.S. citizens:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:21 PM
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<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9434-hj11
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1664

Public Comment 1236. Individual. Jud Lawrie. 7-4-18

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## Submitter Information

**Name:** Jud Lawrie

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## General Comment

It makes no sense to transfer the regulation of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms exports need to be regulated, not promoted. American-made guns do enough damage here at home. We dont want to become responsible for exporting the carnage caused by firearms to other parts of the world. This is wrong-headed and immoral, and I strongly oppose it.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:22 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9435-2ax4
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1665

Public Comment 1237. Individual. David Besser. 7-4-18

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## Submitter Information

**Name:** David Besser

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## General Comment

You can write in something like: I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Turning firearm sales into a commodity is not the way to address gun violence; it would just be another score for the NRA and the gun industry.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:22 PM
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9435-57d7
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1666

Public Comment 1238. Individual. Don Hunter. 7-4-18

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## Submitter Information

**Name:** Don Hunter

**Address:**

686 Meadow Wood Cir NW

Arab, 35016

**Email:** donchunter@comcast.net

**Phone:** 2569314350

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## General Comment

I believe the U.S. should strictly regulate the sale of firearms to other countries. The State Department is more appropriate than Commerce to oversee the sales. Further, the U.S. government should not encourage sales of firearms to other countries. The gun industry has shown that it will go to extreme lengths to promote firearm sales, without consideration for the societal impacts of doing so.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:23 PM
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<b>Tracking No.</b> 1k2-9435-vez0
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1667

Public Comment 1239. Individual. Robert Kuning. 7-4-18

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## Submitter Information

**Name:** Robert Kuning

**Address:**

Albuquerque, NM, 87114

**Email:** bobkuning@comcast.net

**Phone:** 5058988184

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. The NRA is supporting and pushing this legislation to enable gun manufacturers to reap more profits at the cost of more innocent lives.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:23 PM
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<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9435-a3fh
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1668

Public Comment 1240. Individual. Leslie Herman. 7-4-18

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## Submitter Information

**Name:** Leslie Herman

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

This rule change would make the world a far more dangerous place:

- It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[1]
- It would remove licensing requirements for brokers, increasing the risk of trafficking.[2]
- It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[3]

[1] The Trump administration proposes making gun exports easier. Heres how to submit your public comment on this dangerous proposal, Violence Policy Center.

[2] Ibid., Violence Policy Center.

[3] "U.S. requires group to remove 3-D gun instructions from its website," CNN.com, May 13, 2013.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:24 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9435-tecr
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1669

Public Comment 1241. Individual. Michael Loewenstein. 7-4-18

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## Submitter Information

**Name:** Michael Loewenstein

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## General Comment

1. Do not eliminate the Blue Lantern Program.
2. Do not eliminate licensing for brokers.
3. Do not remove block on 3d printing of firearms.

Firearms are dangerous. Most people know how to use them, what the don't know is WHEN to use them if ever.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:25 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9435-4t3m
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1670

Public Comment 1242. Individual. Janet Muir. 7-4-18

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## Submitter Information

**Name:** Janet Muir

**Address:**

2679 Dunbar Woods Rd

Marcellus, NY, 13108

**Email:** jmmuir66@twcny.rr.com

**Phone:** 3156737013

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## General Comment

I oppose this rule change that would switch the regulation of firearms export from the U.S. State Department to the U.S. Commerce Department. If this change is made, Congress would no longer be informed of large arms sales or be able to block them. Military-style weapons, such as semiautomatic assault weapons and other powerful firearms, could be exported to dangerous foreign countries, threatening our national security.

Furthermore, the Commerce Department is focused on promoting the U.S. business interests, not national security. It does not have the resources to adequately enforce export controls, so firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

This change would also eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. And it would remove the State Departments block on the 3D printing of firearms, allowing anyone to make unlimited numbers of weapons.

This administration has claimed that our national security is risked by immigrants at our borders, but this change -- initiated only for motives of profit -- would have the effect of increasing civil wars and gang violence in foreign countries that would bring more people seeking asylum to our borders. Our non-stop wars on terrorism would be made more difficult and costly if our enemies can purchase military-style weapons with impunity.

For all these reasons, this change of regulatory control would be serving the arms makers, but hurting the country as a whole. I oppose it and I hope you will too.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:25 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9435-1bs6
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1671

Public Comment 1243. Individual. Sandra Rohde. 7-4-18

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## Submitter Information

**Name:** Sandra Rohde

**Address:**

W3059 Pinecrest Ct

Appleton, WI, 54915-8197

**Email:** rohde.sandi@gmail.com

**Phone:** 9208502012

**Fax:** 54915-8197

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

I want to keep our country safe & the world safe.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:26 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9435-6ajw
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1672

Public Comment 1244. Anonymous. 7-4-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose the proposed rule change that would put the regulation of exports of firearms in the hands of the Commerce Department rather than the State Department. Terrorists could buy these weapons. I see this rule change as opening up massive sales of firearms throughout the world. This would be a threat to both our national security and the security of the world. Again, I oppose this rule change.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:27 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9435-lrsy
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1673

Public Comment 1245. Individual. Marianne Ludwig. 7-4-18

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## Submitter Information

**Name:** Marianne Ludwig

**Address:**

1420 Saint Clair Avenue

Saint Paul, 55105

**Email:** marianneludwig1420@gmail.com

**Phone:** 2165980259

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## General Comment

If in some alternate universe the Department of State thinks a foreign country needs more automatic weapons, they are far better able to assess that need than the commerce department. Please dont change this rule. We have enough problems with the guns we already have. We dont need to ruin someone rlises Homeland by selling them more unnecessary weapons.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:28 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9435-9p72
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1674

Public Comment 1246. Anonymous. 7-4-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

With this rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:29 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9435-onet
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1675

Public Comment 1247. Individual. Leslee McPherson. 7-4-18

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## Submitter Information

**Name:** Leslee McPherson

**Address:**

3200 Monterey St.  
San Mateo, CA, 94403

**Email:** lesleemcp@att.net

**Phone:** 6505706836

**Fax:** 94403

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## General Comment

I oppose changing oversight of gun sales from the State Department to the Commerce Department. Commerce does not have the resources to take on this job.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:17 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-942z-uwrp
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1411

Public Comment 1090. Individual. Denise Kline. 7-4-18

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## Submitter Information

**Name:** Denise Kline

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The U.S. State Department must remain focused on safeguarding our nation while the U.S. Commerce Department should continue promoting American business. This proposed rule change will have profound impact on our national security as well as the security of nations around the world as new avenues are opened for the worldwide sale of arms. We must work to make our nation and the world safer. This proposed rule will only increase danger here and around the world.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:17 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9434-9mtz
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1658

Public Comment 1230. Individual. Esther Diamondstone. 7-4-18

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## Submitter Information

**Name:** Esther Diamondstone

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## General Comment

Haven't we already had enough of Americans being killed abroad with American weaponry in someone else's hands? I oppose moving the regulation of firearms exports from the State Department to the Commerce Department.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 5:52 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9437-4f10
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1707

Public Comment 1250. Individual. Patricia Malone. 7-4-18

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## Submitter Information

**Name:** Patricia Malone

**Address:**

STONE RIDGE, NY, 12484-5249

**Email:** uncertaintyguru@joimail.com

**Phone:** 8456878707

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Help keep our nation safer from groups who would rapidly take advantage of this change to stockpile more arms.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 5:51 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9437-9e4w
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1706

Public Comment 1251. Individual. Bertino Marro. 7-4-18

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## Submitter Information

**Name:** Bertino Marro

**Address:**

578 10th St.

Brooklyn, NY 11215-4402, NY, 11215

**Email:** bertmarro@hotmail.com

**Phone:** 7188323018

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Currently, firearms exports are classified as military and are under the regulation of the State Department, enabling Congress to block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that should be stopped in the name of national security - even to countries where there are serious human rights concerns.

Furthermore, the Commerce Department does not have adequate resources to enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. Thus firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 5:50 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9437-10dr
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1705

Public Comment 1252. Individual. Elizabeth Russell. 7-4-18

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## Submitter Information

**Name:** Elizabeth Russell

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We can't even keep our own citizens from using firearms on one another. Why on earth would we want to make it easier to arm the world, just for a buck? Please don't let this insanity move forward.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 5:49 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9437-40vp
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1704

Public Comment 1253. Individual. Amy Schneider. 7-4-18

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## Submitter Information

**Name:** Amy Schneider

**Address:**

48 Oxford RD  
Newton, MA, 02459

**Email:** amyshome@yahoo.com

**Phone:** 6173324380

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## General Comment

Do not let the NRA push a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business)

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 5:47 PM
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9437-fsnr
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1703

Public Comment 1254. Individual. Carol Emrick. 7-4-18

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## Submitter Information

**Name:** Carol Emrick

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## General Comment

This president does not speak for me. We have lax gun laws and too may Americans are killed or injured seriously on a daily basis.Until gun owners are responsible for their actions and trained properly on gun ownership this is a ridiculous request.Do not relinquish this control.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 5:46 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9437-5icj
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1702

Public Comment 1255. Individual. Paula H. 7-4-18

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## Submitter Information

**Name:** Paula H.

**Address:**

Richmond, CA, 94801

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## General Comment

I am appalled and outraged by the fact that congress no longer declares war in order for US involvement to take place. I want congress to decide on weapons sales to foreign countries and forces. To have weapons manufacturers benefiting from foreign wars is a paving stone toward fascism. Our president should not be a dictator deciding upon these sales on his own. Congressional debate and decision making must be the process we follow.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 5:44 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9437-s6zc
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1701

Public Comment 1256. Individual. Katherine Wood. 7-4-18

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## Submitter Information

**Name:** Katherine Wood

**Address:**

19 Maka Hou Loop  
Wailuku, HI, 96793

**Email:** ka.wood2011@gmail.com

**Phone:** 808-344-0472

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## General Comment

The control of guns, ammunition, and related articles DOES still BELONG under the Control of US Munitions List. We need the US State Dept. responsible for national security responsible for who gets to buy large batches of weapons, etc. It makes no sense to have the Dept. of Commerce whose primary goal is to promote business & profits to "really" care about protection of the country over profit.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Sometimes changes can be good BUT this places the entire country at risk.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 5:43 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9437-5i03
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1700

Public Comment 1257. Individual. Elaine Fisher. 7-4-18

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## Submitter Information

**Name:** Elaine Fisher

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## General Comment

I oppose this change. Don't make it easier to get guns.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 5:42 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9437-upk9
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1699

Public Comment 1258. Individual. Elizabeth McCloskey. 7-4-18

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## Submitter Information

**Name:** Elizabeth McCloskey

**Address:**

1602 Michigan Avenue

LaPorte, IN, 46350

**Email:** tmconservation@csinet.net

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. The Commerce Department does not have the resources to adequately enforce export controls. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The proposed rule would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. And it would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The world does not need any more weapons and the U.S. does not need this rule change. I strongly oppose this proposed rule to change U.S. international arms regulations.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 5:41 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9437-o9p7
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1698

Public Comment 1259. Individual. Gay Kramer-Dodd. 7-4-18

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## Submitter Information

**Name:** Gay Kramer-Dodd

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## General Comment

I am quite disturbed to learn that our government wants to contribute to greater violence, instability, and war in the world. Yet that is what this rule would do, by moving the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

I can see why the National Rifle Association is promoting this -- they want to encourage more gun sales. But other than arms manufacturers profits, there is only detriment, not benefit, to everyone else.

This rule change would It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

In the interest of our national security and the safety of people in the US and all over the world, please reject this rule change.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 5:40 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9437-4oxq
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1697

Public Comment 1260. Anonymous. 7-4-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 5:39 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9437-wrwn
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1696

Public Comment 1261. Individual. Joe Veltri. 7-4-18

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## Submitter Information

**Name:** Joe Veltri

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## General Comment

This is insanity! Please don't allow more weapons in this violent world. Think about humanity. I strongly oppose this change.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 5:37 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9437-r8ha
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1695

Public Comment 1262. Individual. Julia Knight. 7-4-18

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## Submitter Information

**Name:** Julia Knight

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## General Comment

I oppose the firearms rule change!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 5:36 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9437-ct3i
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1694

Public Comment 1263. Anonymous. 7-4-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I strongly oppose relaxing rules to make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, I support saving lives as a priority. Thank you for considering my views.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 5:35 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9437-lyqn
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1693

Public Comment 1264. Individual. Susan Singh. 7-4-18

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## Submitter Information

**Name:** Susan Singh

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## General Comment

Under no circumstances should the sale of firearms abroad be put under the Commerce Department. Then we will clearly have the situation we have now in the U.S. - the burgeoning and unregulated sale of deadly weapons to mentally ill people, criminals, youth, against the will and welfare of the majority of people in the U.S. Now, already the biggest arms sales purveyor in the world, we want to sell more arms around the world, so other cultures will have our problem of way too many very dangerous firearms in the hands of the wrong people. I am not opposed to all business, just opposed to businesses that harm people such as weapons manufacturers.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 5:34 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9437-ho5w
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1692

Public Comment 1265. Anonymous. 7-4-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

As a US Citizen I do not approve of this change in regulations.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 5:33 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9437-6h0w
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1691

Public Comment 1266. Individual. Tina McKim. 7-4-18

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## Submitter Information

**Name:** Tina McKim

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. International arm sales should absolutely be under state control, not controlled by profit margins. Treating international gun sales as a commodity to be ever increased will increase global violence and threaten national security. It would put so many guns into the wrong hands and would be disastrous.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 5:32 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9437-zsl2
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1690

Public Comment 1267. Individual. Marietta Carter. 7-4-18

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## Submitter Information

**Name:** Marietta Carter

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Here are more details on how the rule change would make the world a far more dangerous place:

- 1) It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- 2) It would remove licensing requirements for brokers, increasing the risk of trafficking.
- 3) It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 5:31 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9437-upyx
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1689

Public Comment 1268. Individual. Jennifer Loudon. 7-4-18

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## Submitter Information

**Name:** Jennifer Loudon

**Address:**

54 Tryon Farm Lane  
Michigan City, 46360

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## General Comment

I absolutely oppose this change. These are weapons of war, and their regulation belongs fully and permanently under the authority of the State Department.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 5:30 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9438-119p
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1688

Public Comment 1269. Anonymous. 7-4-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

My husband and I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 5:29 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9438-5gmr
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1687

Public Comment 1270. Individual. Nancy Roberts-Moneir. 7-4-18

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## Submitter Information

**Name:** Nancy Roberts-Moneir

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## General Comment

As long as the export of firearms is under the regulation of the State Department, Congress can block sales of large batches of firearms to foreign countries. A rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department, would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. With a change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

In addition, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have adequate staff available at the multiple locations necessary. Without adequate controls, firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. The obvious security nightmare such a change would create far outweighs financial benefits to private American weapons manufacturers, and the plan should be not just shelved, but tossed out permanently.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 5:25 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9438-sqyl
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1686

Public Comment 1271. Anonymous. 7-4-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose the rule change switching the regulation of gun exports from State Dept. to Commerce.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The safety and security of American citizens requires that large gun sales continue to be classed as "military" and overseen by the State Dept. and Congress.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 5:27 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9438-uwop
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1685

Public Comment 1272. Anonymous. 7-4-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. If a rule change occurs that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business), it would open new floodgates for arms sales internationally, with serious implications for our national security.

Now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the insane rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

The rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The Commerce Department does not have the resources or mission to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. Firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Firearms are used to kill people every day around the world in acts of organized crime, political violence,

terrorism, and human rights violations. They should be subject to more controls, not less!

I vigorously oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I demand that rule change die before human beings do.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 5:21 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9438-ubb6
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1684

Public Comment 1273. Individual. Nancy Morimoto. 7-4-18

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## Submitter Information

**Name:** Nancy Morimoto

**Address:**

115 Whits Road

Mountain View, CA, 94040

**Email:** nancy94040@gmail.com

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## General Comment

I oppose switching the regulation of firearms exports from the State Department to the Commerce Department. Guns are clearly in a very separate category from other commercial products. Toasters are not used by terrorists, organized crime, or for political violence.

The United States needs to maintain or even increase strict export controls and rigorous enforcement of firearms trade. The proposed change would remove licensing requirements for brokers, resulting in increased firearms trafficking. This will put many more lives around the world in danger from the unscrupulous use of firearms.

This change would also result in the elimination of the State Department's Blue Lantern program, which carries out hundred of pre-license and post-shipment inspections and publicly reports on them.

The oversight of the export of items with clear potential military or illegal use should remain with the State Department.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 5:22 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9438-guxz
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1683

Public Comment 1274. Individual. Henriet Nadler Cohen. 7-4-18

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## Submitter Information

**Name:** Henriet Nadler Cohen

**Address:**

2727 Palisade Ave.

Bronx, NY, 10463

**Email:** henrietcohen22@gmail.com

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## General Comment

To Whom It May Concern,

I am a mother, grandmother and Social Worker. In my work with children, I saw first hand the devastating effects of gun violence on families. I am writing because the spread of guns, automatic assault rifles is a truly an assault on civil society.

This is why I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semi automatic assault rifles as non-military". This is despite the fact that U.S troops routinely use their military rifles in semi automatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

This is why I am opposed to moving oversight for firearms from the State Department.

Firearms unnecessarily kill a thousand people every day in acts of organized crime, political violence, terrorism and human rights violations. They should be subject to MORE CONTROLS, not fewer.

Respectfully,

Henriet Nadler Cohen

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:46 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9438-xsa1
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1682

Public Comment 1275. Individual. Jean Grattet. 7-4-18

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## Submitter Information

**Name:** Jean Grattet

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## General Comment

Allowing unregulated sale of weapons to foreign countries is an obvious ploy by the NRA representing Gun Manufacturers would be a disastrous action. It is difficult to understand how any moral person would support this.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:45 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9438-dvzf
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1681

Public Comment 1276. Individual. DeeDee Tostanoski. 7-4-18

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## Submitter Information

**Name:** DeeDee Tostanoski

**Address:**

400 Madison St

#901

Alexandria, VA, 22314

**Email:** ddtmagnolia@gmail.com

**Phone:** 703-548-9060

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## General Comment

I strongly oppose the removal of international arms regulation from the State Dept to the Commerce Dept. State is in the unique position to evaluate the international impact of arms sales to particular individuals and areas of the world, as well as to identify likely bad actors in this exchange. Arms dealers around the world have been contributing to making the world a more dangerous place, and State has been able to limit some of that impact. The mission of the Department of Commerce is to promote commerce, not to secure the safety of the world's citizens. This shift in responsibility is ill-advised and will have dangerous repercussions.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:44 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9438-u3yz
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1680

Public Comment 1277. Individual. Emma Houseman. 7-4-18

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## Submitter Information

**Name:** Emma Houseman

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## General Comment

Please refuse to accept the regulation of semiautomatic guns and similar devices to foreign countries or individuals. This can only lead to far greater danger to our country and its people. This regulation must remain under the US State Department whose mandate is to protect our country's safety, rather than your's whose mandate is to increase foreign sales.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 4:42 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9438-cgdx
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1679

Public Comment 1278. Anonymous. 7-4-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

To whom it may concern - as a U.S. resident in the state of Texas, I oppose this rule change that would enable gun sales to other countries. Our own current state of gun mania and lax regulations is killing too many young Americans, we have a moral obligation not to perpetuate this problem in other countries for the sake of corporate greed.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 2:48 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9438-r0if
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1619

Public Comment 1279. Individual. Judith Herzfeld. 7-4-18

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## Submitter Information

**Name:** Judith Herzfeld

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## General Comment

Increasing international commerce in guns will just increase violence in receiving countries and drive more refugees to our borders. Don't we have more than enough of that already?

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 2:48 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9438-m564
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1618

Public Comment 1280. Individual. George Fuller. 7-4-18

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## Submitter Information

**Name:** George Fuller

**Address:**

4624 SW 333rd Ct  
Federal Way, WA, 98023

**Email:** george-fuller@att.net

**Phone:** 2538785638

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## General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses.

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.[4] Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 2:47 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9438-bmzk
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1617

Public Comment 1281. Individual. Ruth Sheldon. 7-4-18

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## Submitter Information

**Name:** Ruth Sheldon

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## General Comment

Please do not make this rule change. We need the tightest possible control on the sale of firearms, in our country and in the world and putting control under the Dept of Commerce will just encourage more sales. The State Department's function is to help create a more peaceful world. The Department of Commerce is just interested in selling more stuff.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 2:46 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9438-clsf
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1616

Public Comment 1282. Anonymous. 7-4-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

this should be unconstitutional due to the liabilities to our own military abroad and us police agencies involved with the drug trade.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 2:45 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9439-f1ng
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1615

Public Comment 1283. Individual. Elizabeth Songalia. 7-4-18

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## Submitter Information

**Name:** Elizabeth Songalia

**Address:**

649 Waseca St.

St. Paul, MN, 55107

**Email:** reinsong@q.com

**Phone:** 6512243718

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## General Comment

Firearms exports must continue to be classified as military. They must remain under the regulation of the State Department so Congress can block sales of large batches of firearms to foreign countries.

I am opposed to switching the regulation of firearms exports from the State Department to the Commerce Department because this change would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The State Departments Blue Lantern program must not be eliminated.

Licensing requirements for brokers must not be eliminated.

The State Departments block on the 3D printing of firearms must not be eliminated.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 2:44 PM
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9439-42gd
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1614

Public Comment 1284. Individual. Nydia Leaf. 7-4-18

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## Submitter Information

**Name:** Nydia Leaf

**Address:**

46 West 95 Street

#3B

New York, NY, 10025-6718

**Email:** nyleaf13@gmail.com

**Phone:** 2128657875

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## General Comment

To the U.S. Commerce Department - To Whom It May Concern:

My family and I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It is a matter of national security - we must not and cannot permit any change that will open the floodgates of weapons trading.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 2:43 PM
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<b>Tracking No.</b> 1k2-9439-4tmz
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1613

Public Comment 1285. Individual. Randall Potts. 7-4-18

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## Submitter Information

**Name:** randall potts

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## General Comment

I strongly oppose the Rule change in International Traffic in Arms Regulation. This is a terrible change to longstanding and effective regulation of international arms sales from the USA that will not only harm our standing in the civilized western world, but also help arm the worst war criminals who oppress their own people.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The only beneficiaries of this rule change are gun manufactures, arms dealers and the vermin they arm. This makes the USA less safe and compromises our moral standing and values. This change is totally against the interests of USA citizens. Please do not do it.





# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 2:41 PM
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9439-rcze
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1612

Public Comment 1286. Individual. Lois Feuer. 7-4-18

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## Submitter Information

**Name:** Lois Feuer

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The rule change would make such sales a matter of money rather than one of national/international defense and security. We do harm to our own and other nations when we supply deadly weapons to terrorists and lawless governments.

This kind of sale alienates law-abiding nations (of which we should be the leader), betrays international agreements, and foments violence around the world.

For these reasons I oppose the change.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 2:41 PM
<b>Received:</b> July 04, 2018
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<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1611

Public Comment 1287. Individual. Mary Duerksen. 7-4-18

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## Submitter Information

**Name:** Mary Duerksen

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## General Comment

I oppose moving the regulation of firearms exports from the Department of State to Department of Commerce. This change would make the world a more dangerous place:

- It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- It would remove licensing requirements for brokers, increasing the risk of trafficking.
- It would remove the State Departments block on the 3D printing of firearms. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 2:39 PM
<b>Received:</b> July 04, 2018
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9439-xh95
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1610

Public Comment 1288. Individual. Nancy O Byrne. 7-4-18

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## Submitter Information

**Name:** Nancy O'Byrne

**Address:**

5308 2nd Street

St. Augustine, FL, 32080

**Email:** obyrrnen@bellsouth.net

**Phone:** 9044223618

**Fax:** 32080

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## General Comment

This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.I oppose this proposed rule.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 2:39 PM
<b>Received:</b> July 04, 2018
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9439-7ebt
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1609

Public Comment 1289. Individual. Adina Parsley. 7-4-18

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## Submitter Information

**Name:** Adina Parsley

**Organization:** none

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Leave firearm export regulations with the State Department whose primary interest is national security and not with the Commerce Department whose primary interest is promoting American business.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 2:37 PM
<b>Received:</b> July 04, 2018
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<b>Tracking No.</b> 1k2-9439-mj3b
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1608

Public Comment 1290. Individual. Concerned Citizen. 7-4-18

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## Submitter Information

**Name:** Concerned Citizen

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## General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It would make the world a more dangerous place and increase the number of firearms thereby increasing crime and adding to the unsafe conditions that can cause increased migration. Firearms are definitely munitions that need to stay.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 2:36 PM
<b>Received:</b> July 04, 2018
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<b>Tracking No.</b> 1k2-9439-f4l4
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1607

Public Comment 1291. Individual. Kathryn Rose. 7-5-18

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## Submitter Information

**Name:** Kathryn Rose

**Address:**

2749 N Lafayette St  
Denver, CO, 80205-4448

**Email:** mizkate52@msn.com

**Phone:** 720-312-7032

**Fax:** 80205-4448

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## General Comment

I oppose the rule change that would place weapons sales under the oversight of the Department of Commerce rather than the U.S. Department of State. There is no need to change the current review system.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 2:35 PM
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9439-nk5l
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1606

Public Comment 1292. Individual. Mary Starr. 7-4-18

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## Submitter Information

**Name:** Mary Starr

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## General Comment

I oppose switching oversight on gun sales from the State Department to the Commerce Department.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 2:34 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9439-nu23
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1605

Public Comment 1293. Individual. Cheryl Pressgrove. 7-4-18

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## Submitter Information

**Name:** Cheryl Pressgrove

**Address:**

TX,

**Email:** cpressgrove@sbcglobal.net

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## General Comment

We do not need to allow the greed of the NRA and gunmakers to flood the world with more guns. We have a huge problem with gun violence in our country and immigrants fleeing even greater gun violence in their countries. Our borders are overwhelmed with people seekin asylum. We as a nation have a moral obligation not to help spread violence to other countries. The poor in most countries would not have the means to buy weapons but they could be purchased and used against the poor in fledgling democracies!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 2:33 PM
<b>Received:</b> July 04, 2018
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<b>Tracking No.</b> 1k2-9439-4q41
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1604

Public Comment 1294. Individual. Alicia Shapinsky. 7-4-18

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## Submitter Information

**Name:** Alicia Shapinsky

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## General Comment

I oppose this rule change switching the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Such a switch would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Firearms exports should remain under the regulation of the U.S. State Department. Thank you.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 2:32 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943a-2iiu
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1603

Public Comment 1295. Individual. Patrizia Lazzeri. 7-4-18

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## Submitter Information

**Name:** Patrizia Lazzeri

**Address:**

1138 Veranda Court

Leland, NC, 28451

**Email:** lazgang@aol.com

**Phone:** 919 619-0562

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## General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

You MUST do everything in your power to never allow this to happen! You MUST keep ALL Americans safe in our own country! Thank you!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 2:31 PM
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943a-1mk4
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1602

Public Comment 1296. Individual. Carole Katz. 7-4-18

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## Submitter Information

**Name:** Carole Katz

**Address:**

306 Heritage Hills  
Somers, NY, 10589

**Email:** dori12@aol.com

**Phone:** 212 831 3001

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## General Comment

There are too many firearms in this country already- more than for everyone of us to have them. Children are being murdered in their schools. We need more not less oversight. How much is the NRA encouraging this change. There only interest is making money & spreading fear. They arent really trying to protect us. The spread of fire arms has only increased the number of deaths by firearms contrary to popular information spread by them. Stop the killing. Stop this change. Thank you.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 2:30 PM
<b>Received:</b> July 04, 2018
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943a-mjnw
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1601

Public Comment 1297. Individual. Suzanne Heidemann. 7-4-18

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## Submitter Information

**Name:** Suzanne Heidemann

**Address:**

57250 721 RD

Jansen, NE, 68377

**Email:** dheidemann@diodecom.net

**Phone:** 4026564817

**Fax:** 68377

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## General Comment

I strongly disagree with giving the US Commerce Department regulatory control over the export of firearms to foreign countries. I feel this would put our national security at risk. This department does not have the resources found at the State Department and could put weapons in the hands of terrorists and criminal elements. Why as a country would we want to risk this happening?

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 2:29 PM
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<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1600

Public Comment 1298. Individual. R Catania. 7-4-18

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## Submitter Information

**Name:** R catania

**Address:**

scituate, RI, 02857

**Email:** greenhills12345@gmail.com

**Phone:** 4014750000

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## General Comment

I vehemently DO NOT agree with the proposed rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. This is a dangerous proposal, as It would eliminate the State Departments Blue Lantern program on inspections and reports.

It would also remove licensing requirements for brokers, increasing the risk of trafficking tremendously. DO NOT CHANGE THE RULE.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 2:28 PM
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<b>Comments Due:</b> July 09, 2018
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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1599

Public Comment 1299. Individual. Chris Saia. 7-4-18

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## Submitter Information

**Name:** Chris Saia

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms.

When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Changing any of these rules, at this point, would be bat-shit crazy.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 1:00 PM
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1593

Public Comment 1300. Individual. RJ Cooper. 7-4-18

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## Submitter Information

**Name:** RJ Cooper

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## General Comment

Limit arms exports. Do not move jurisdiction to Commerce! If that is done, almost anyone, anywhere can purchase military grade weapons.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 12:59 PM
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1591

Public Comment 1301. Individual. Rita Carter. 7-4-18

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## Submitter Information

**Name:** Rita Carter

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## General Comment

I oppose the proposed rule changes that would result in less regulation of weapon & ammunition sales that would increase the danger of violent acts occurring in the US, as well as other countries.

Currently firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1588

Public Comment 1302. Individual. Paul Runion. 7-4-18

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## Submitter Information

**Name:** paul runion

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## General Comment

i oppose the rule change which would switch the regulations of firearms export from the U.S Dept. of State to the U.S. Dept. of Commerce

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 12:57 PM
<b>Received:</b> July 04, 2018
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943b-qxhy
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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1586

Public Comment 1303. Individual. Pam Pouchot. 7-4-18

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## Submitter Information

**Name:** Pam Pouchot

**Address:**

103 Kimberly Ct  
Yorktown, VA, 23692

**Email:** plpouchot@cox.net

**Phone:** 757-898-8453

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## General Comment

Aren't there enough armed terrorists in the world without the US providing an unlimited amount of deadly weapons to them?

In the past the US has had enough common sense to ban the unfettered sales of firearms/ammunition to foreign countries.

Apparently there are those in our government who feel arming those who may eventually use those weapons to kill Americans

as well as our allies is a good position to hold as long as the firearms industry can make a buck. I value innocent life more

than they do. I strongly urge you to retain the existing rules to keep the world a slightly safer place.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 12:56 PM
<b>Received:</b> July 04, 2018
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943b-w2nd
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1584

Public Comment 1304. Individual. Carolyn Knoll. 7-4-18

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## Submitter Information

**Name:** Carolyn Knoll

**Address:**

2 Irwin Way, Apt. 208  
Orinda, CA, 94563-2552

**Email:** clk5356@gmail.com

**Fax:** 94563-2552

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## General Comment

As a citizen of the United States, I am very concerned about gun violence and our exporting of this violence by selling guns to other countries. I oppose the proposed rule for the following reasons:

1. The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.
2. The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.
3. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government -- i.e., taxpayers -- will absorb the cost of reviewing

applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

4. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking.

5. The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

6. The Commerce Department does not have resources to enforce export controls, even before the addition of 30,000 firearms export licenses as a result of this rule predicted by Commerce. The BISs enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.

7. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

# PUBLIC SUBMISSION

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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1583

Public Comment 1305. Individual. Sharon Tuttle. 7-4-18

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## Submitter Information

**Name:** Sharon Tuttle

**Address:**

Arcata, CA, 95521

**Email:** smtuttle@alumni.rice.edu

**Phone:** +11234567890

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## General Comment

I am writing to strongly oppose this rule change that would switch the regulation of firearms exports from the U.S. State Department to the U.S. Commerce Department.

This rule change has the potential to harm both national security and international human rights. For example, with the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

The Commerce Department simply does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large quantities of American guns and ammunition.

Thus, switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

This rule change would be dangerous and irresponsible, and must not go forward.

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1582

Public Comment 1306. Individual. Stephanie Johnson. 7-6-18

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## Submitter Information

**Name:** Stephanie Johnson

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## General Comment

I am opposed to the proposal to shift the handling of export licenses for semi-automatic firearms from the Department of State to the Department of Commerce. I believe that this change would weaken our national security, and make it easier for firearms to get into the hands of dangerous people who have no business possessing firearms. The State Department is better equipped to determine national security issues.





# PUBLIC SUBMISSION

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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1564

Public Comment 1308. Individual. Cindy Kuenzi. 7-4-18

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## Submitter Information

**Name:** Cindy Kuenzi

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The firearms we export will likely be used against our own citizens abroad or those of our allies. Enough.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 12:38 PM
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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1563

Public Comment 1309. Individual. Daniel Blum. 7-4-18

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## Submitter Information

**Name:** Daniel Blum

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer. Please do not forget that immigrants are entering America through its southern border requesting asylum from their home countries due to gang violence. Remember these gangs and other violent people are receiving their guns from America more often than from any other country. Hence, the only reason for more easily allowing guns made in America to be shipped across its border is because there is no perceived threat to America's border security by your department. Until the State department declares that there is no increased security threat to America's southern border and vigorously denounce any actions to increase funding for border security, including for more personal or for building more walls on America's southern border, your department should refuse to take over regulations that have more than just civil commerce implications.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 12:37 PM
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1561

Public Comment 1310. Individual. Marjel Zaldivar. 7-4-18

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## Submitter Information

**Name:** Marjel Zaldivar

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. This is not just about business. This is more importantly about people's safety, and ultimately, America's safety.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 12:36 PM
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<b>Tracking No.</b> 1k2-943c-zco4
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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1559

Public Comment 1311. Individual. Elaine Pinches. 7-4-18

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## Submitter Information

**Name:** Elaine Pinches

**Address:**

49 Marion St Apt 3B

Brookline, 02446

**Email:** elainepinches2003@yahoo.com

**Phone:** 6179356866

**Fax:** 02446

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## General Comment

Please don't change the regulations! Thank you!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 12:35 PM
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<b>Posted:</b> July 17, 2018
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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1556

Public Comment 1312. Individual. James Phelps 7-4-18

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## Submitter Information

**Name:** James Phelps

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## General Comment

I am a registered gun owner and I oppose placing the export of firearms under the aegis of the Commerce Department. They are correctly classified as military and belong under the purview of the State Department.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 12:34 PM
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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1554

Public Comment 1313. Individual. Lewise Busch. 7-4-18

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## Submitter Information

**Name:** Lewise Busch

**Address:**

750 Weaver Dairy Rd. 1223  
Chapel Hill, NC, 27514-4900

**Email:** lewisebusch@gmail.com

**Phone:** 9199183510

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## General Comment

Dear sir or madame:

I heartily oppose the transition of control over the export of firearms to the Department of Commerce from the Department of State. The state department has more knowledge of the world situations in which more arms could exacerbate violence and reduce protections of civil rights and liberties. It also has more experience than Commerce in assessing the likelihoods that criminal enterprises or rogue sources of violence could be fueled by such arms transfers. It is set up to help reduce the pressure on peace by terrorists. It can help ameliorate the pressures on borders from mass immigration.

I hope not to see pictures on TV of what happens when we open the floodgates of weapons even further.

Sincerely,

Lewise Busch

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 12:33 PM
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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1552

Public Comment 1314. Individual. Dawn Albanese. 7-4-18

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## Submitter Information

**Name:** Dawn Albanese

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Once the almighty dollar becomes involved, all morality & common sense fly out the window.

Thank you for your time & consideration on this important matter.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 12:20 PM
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1549

Public Comment 1315. Individual. James Bachman. 7-4-18

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## Submitter Information

**Name:** James Bachman

**Address:**

70 White Oak Cir

Saint Charles, IL, 60174

**Email:** jbachman1190@sbcglobal.net

**Phone:** 6305841190

**Fax:** 60174

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## General Comment

I object to the international trade in firearms shifting from the Department of State to the Commerce Department. We need to keep control of where the arms and what type of arms are going, what they will be used for, and whether the the use is consistent with US values. The Commerce Department is charged with selling the US commerce, not in making value judgements on our exports. Do not transfer our arms sales to the Commerce Department.



# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1548

Public Comment 1316. Individual. Jeanne Hogan. 7-4-18

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## Submitter Information

**Name:** Jeanne Hogan

**Address:**

4 Merrick Place

Pennington, NJ, 08534

**Email:** jdh3011@aol.com

**Fax:** 08534

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I do not want to see firearms exported to oppressive regimes, removal of safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and do not want to further & fuel violence that destabilizes countries and causes mass migration.[4]

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 12:07 PM
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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1547

Public Comment 1317. Individual. Marie Braga. 7-4-18

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## Submitter Information

**Name:** Marie braga

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## General Comment

Please STOP. Do not sell guns internationally. There are too many guns! Stop promoting guns to make money.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 12:06 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943e-c7at
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1546

Public Comment 1318. Individual. Barbara Matthews. 7-4-18

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## Submitter Information

**Name:** Barbara Matthews

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## General Comment

Please do not change the control of sale of firearms from the State Department to the Department of Commerce. Firearms exports should be continued to be classified as military", so that Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Unacceptable!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 12:05 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943e-1s63
<b>Comments Due:</b> July 09, 2018
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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1545

Public Comment 1319. Individual. Jean Ross. 7-4-18

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## Submitter Information

**Name:** Jean Ross

**Address:**

3624 Bryant Ave. S.  
Minneapolis, MN, 55409

**Email:** jfross@umn.edu

**Phone:** 6128242080

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. This is unacceptable and should not be allowed so that the NRA and gun manufacturers can sell more arms.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 12:04 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943e-1r9t
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1544

Public Comment 1320. Individual. Jessica R Semon. 7-4-18

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## Submitter Information

**Name:** Jessica R Semon

**Address:**

PO Box 124

Brockport, NY, 14420

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It would endanger human lives, including those of US citizens.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 12:03 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943e-ljml
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1543

Public Comment 1321. Individual. Glen Anderson. 7-5-18

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## Submitter Information

**Name:** Glen Anderson

**Address:**

5015 15th Ave SE

Lacey, WA, 98503

**Email:** glenanderson@integra.net

**Phone:** 360.491.9093

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## General Comment

I STRONGLY OPPOSE Trump's proposal to move export license oversight for firearms from the Department of State to the Department of Commerce THAT WOULD PROMOTE TERRORISM by making firearms seem like just another commercial commodity for the Dept. of Commerce to rubber-stamp.

The Dept. of State knows what's going on in other countries, so the Dept. of State should continue its oversight power.

Trump's proposed rule change treats semiautomatic assault rifles as non-military. WHAT BALONEY!!!!  
U.S. troops routinely use their military rifles in semiautomatic mode.  
Foreign militaries and TERRORISTS use them.  
TRUMP WANTS FOREIGN DICTATORS AND TERRORISTS TO GET EASIER ACCESS TO GUNS!!!!!!!!!!!!!!!!!!!!!!

The proposed rule also eliminates Congressional oversight for important gun export deals. WE NEED OVERSIGHT!

The rule IMPOSES COSTS UPON TAXPAYERS that gun manufacturers should pay (costs of processing

licenses).

The rule allows unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

PROTECT HUMAN RIGHTS!!!! PREVENT TRUMP FROM ARMING TERRORISTS!!!!

STOP THIS INCREDIBLY RECKLESS AND STUPID RULE!!!!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 12:01 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943e-74w5
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1542

Public Comment 1322. Individual. Nicole Taylor. 7-4-18

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## Submitter Information

**Name:** Nicole Taylor

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Dept. to the U.S. Commerce Dept. because it would undermine the safety of the United States and its citizens. The Commerce Dept. cannot appropriately keep guns out of the hands of gun traffickers, terrorists, or human rights abusers, among others.



# PUBLIC SUBMISSION

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<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943e-tba7
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1541

Public Comment 1323. Individual. Barbara Hicks. 7-4-18

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## Submitter Information

**Name:** Barbara Hicks

**Address:**

921 Ell Way

Sarasota, FL, 34243

**Email:** bhicks\_ee@hotmail.com

**Phone:** 9417526940

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## General Comment

I am writing against the proposed rule change to switch the regulation of firearms exports from the State Department to the Commerce Department. This change would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

More specifically, the rule change would weaken the control of arms shipments by doing the following:

- 1) eliminating the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them;
- 2) removing licensing requirements for brokers, increasing the risk of trafficking; and
- 3) removing the State Departments block on the 3D printing of firearms.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:58 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943f-s0kw
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1540

Public Comment 1324. Individual. Maurine Canarsky. 7-4-18

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## Submitter Information

**Name:** Maurine Canarsky

**Address:**

P.O. Box 82207

Portland, OR, 97282

**Email:** canarskyyomo@gmail.com

**Phone:** 5037197332

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## General Comment

I am writing to express my strong and vehement opposition to this rule change.

Switching the regulation of firearms exports from the State Department to the Commerce Department facilitates firearms exports to oppressive regimes, removes much-needed safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuels violence that destabilizes countries and causes mass migration.

This rule change eliminates the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It removes licensing requirements for brokers, increasing the risk of trafficking.

It removes the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch removes this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

We need a safer world, not a more dangerous one. This rule change enables the proliferation of weapons world wide. This is at best a misguided proposal and at worse an unconscionable action. Stop it now.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:57 AM
<b>Received:</b> July 04, 2018
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943f-xskm
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1539

Public Comment 1325. Individual. Betty Chernansky. 7-4-18

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## Submitter Information

**Name:** Betty Chernansky

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## General Comment

I oppose the rule that would switch the regulation of fire arms export from the State Department to the department of Commerce. switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:56 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943f-1509
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1538

Public Comment 1326. Individual. Maria Grazia Bruschi. 7-4-18

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## Submitter Information

**Name:** Maria Grazia BRUSCHI

**Address:**

200 E 57TH ST

APT 19D

NEW YORK, 10022

**Email:** mgbruschi@cs.com

**Fax:** 10022

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

The rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:54 AM
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<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943f-o2ob
<b>Comments Due:</b> July 09, 2018
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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1537

Public Comment 1327. Individual. Jesus Bustos. 7-5-18

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## Submitter Information

**Name:** Jesus Bustos

**Address:**

5614 Palo Verde

Corpus Christi, TX, 78417

**Email:** jbustos58@msn.com

**Phone:** 361-232-2309

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## General Comment

I oppose the change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department for I think this would open the flood gates to fire arms around the world There is no good reason to make this change other then to aid an industry that has little regard for the finality of it's product and will have serious repercussions that would not be understood until it's too late. Again we ask the department please use all it's resources to oppose this move.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:54 AM
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<b>Tracking No.</b> 1k2-943g-z0r5
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1536

Public Comment 1328. Individual. Kenneth Loehlein. 7-5-18

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## Submitter Information

**Name:** Kenneth Loehlein

**Address:**

8608 NE 13th Place  
Vancouver, WA, 98665

**Email:** kenloehlein@yahoo.com

**Phone:** 920-737-2388

---

## General Comment

I oppose the transfer of firearms and ammunitions exports from the U.S. Dept. of State to the U.S. Dept. of Commerce. The safety and security of the United States will be better served if firearms and ammunitions exports remain under the U.S. Dept. of State.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:53 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943g-uhof
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1535

Public Comment 1329. Individual. Jennifer Schultz. 7-5-18

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## Submitter Information

**Name:** jennifer schultz

**Address:**

56 edgebrook estates #7

buffalo, NY, 14227

**Email:** firls4eva@roadrunner.com

**Phone:** 716-683-2628

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## General Comment

This is a horrible idea. There is adequate sales of weapons right here in the united states. The chamber of commerce has too much influence. I don't understand how people don't see that this will make our world less safe; not just here in the united states but for those countries that are already in states of violence.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:52 AM
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<b>Tracking No.</b> 1k2-943g-20ox
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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1534

Public Comment 1330. Individual. Peter Rogan. 7-5-18

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## Submitter Information

**Name:** Peter Rogan

**Address:**

4062 W 13 Mile Rd Apt B

Royal Oak, MI, 48073

**Email:** progan01@yahoo.com

**Phone:** 2485889591

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## General Comment

I can think of no greater danger to the world and its peace than for the United States to treat the world as simply one gigantic single-person gun market. Somebody apparently thinks that an armed society is a polite society, and has forgotten South Sudan and Ethiopia.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:50 AM
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943g-h5ad
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1533

Public Comment 1331. Individual. Angela Kelly. 7-5-18

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## Submitter Information

**Name:** Angela Kelly

**Address:**

1817 Adams St SE  
Olympia, WA, 98501

**Email:** angiesfemail@yahoo.com

**Phone:** 360-357-7692

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## General Comment

I am entirely opposed to any rule change that would declassify firearms as military and/or that would result in a change of the regulation of firearms exports from the U.S. Department of State to the U.S. Commerce Department. This proposed change would dramatically endanger our national and international security.

The safeguards that are in place, including the Blue Lantern program, licensing and inspection policies, a block on the 3D printing of firearms, along with congressional and public oversight that exists because the U.S. Department of State oversees the export of firearms cannot be underestimated in our global security.

It is important to keep the regulations of firearms within the jurisdiction of the U.S. Department of State and to continue to classify the export of firearms as military.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:49 AM
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<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943h-en96
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1532

Public Comment 1332. Individual. Dian Lopez. 7-5-18

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## Submitter Information

**Name:** Dian Lopez

**Address:**

5770 Burkeys LN NW  
Alexandria, MN, 56308

**Email:** lopezdr@morris.umn.edu

**Phone:** 3202871517

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## General Comment

Export licenses for powerful firearms should be handled by the state department not the commerce department. The object is NOT to make more money but to protect our national security.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:49 AM
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<b>Tracking No.</b> 1k2-943h-cxde
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1531

Public Comment 1333. Individual. Susan P. Walp. 7-5-18

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## Submitter Information

**Name:** Susan P. Walp

**Address:**

Cranbrook, BC, V1C 2V9

**Email:** susanwalp@gmail.com

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms regulation must be fully funded, and the State Department already has many mechanisms in place.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:48 AM
<b>Received:</b> July 05, 2018
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943h-exrq
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1530

Public Comment 1334. Individual. Charles Toll. 7-5-18

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## Submitter Information

**Name:** CHARLES TOLL

**Address:**

VERO BEACH, FL, 32960

**Email:** chucktoll@hotmail.com

**Phone:** 7725840658

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## General Comment

I strongly oppose the proposed rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

At present, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security, and for the security of numerous nations around the world.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration This would be an extremely wrong-minded and harmful change.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you for taking action to help make our country and our world a safer place. Vote against the proposed new rule!

CharlesToll  
Concerned Citizen

# PUBLIC SUBMISSION

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<b>Tracking No.</b> 1k2-943h-dds5
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1529

Public Comment 1335. Individual. R C. 7-5-18

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## Submitter Information

**Name:** R C

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## General Comment

Firearms, Guns, Ammunition, and Related Articles, like the human beings who use them, remain unchanged over the past two centuries, except for their capacity to cause harm. Control belongs under the USML now more than ever.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:45 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
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<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1528

Public Comment 1336. Individual. Miriam Burstein. 7-5-18

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## Submitter Information

**Name:** Miriam Burstein

**Address:**

27 East Central  
Paoli, PA, 19301

**Email:** punkin5170@gmail.com

**Phone:** 610-725-1085

**Organization:** NA

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## General Comment

I oppose switching the regulation of firearms exports from the State Department to the Department of Commerce. I fear that doing so would make it easier for weapons to get into the hands of organized crime and terrorist organizations around the world and would remove congressional oversight from the practice of selling weaponry. Decisions about weapons sales need to take into account issues of human rights violations, as well as problems of uncontrolled violence in countries where peaceful civilian life has broken down. These are matters for the State Department and Congress to investigate and assess, and are not mere business concerns.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 12:31 PM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943m-qhjp
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1550

Public Comment 1337. Individual. Sheri Wells-Jensen. 7-5-18

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## Submitter Information

**Name:** Sheri Wells-Jensen

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## General Comment

Export of weapons should be controlled by the state department. This is not like selling books, lamps or toasters. We cannot allow gun manufacturers to inject weaponry into any potentially dangerous situation they please simply for money.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:42 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943m-qrij6
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1527

Public Comment 1338. Anonymous. 7-5-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security and the Commerce Department just does not have the resources to adequately enforce export controls.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:40 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943n-5r6i
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1526

Public Comment 1339. Individual. Barbara Kelly-Greco. 7-5-18

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## Submitter Information

**Name:** Barbara Kelly-Greco

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## General Comment

Regulations of firearms exports belongs with the State Department not the Commerce Dept. This move would allow automatic and semi-automatic weapons to be sold more easily and with less regulations to terrorists and oppressive regimes around the world.

Why would you think exporting Americas gun violence problem to the entire world is a good idea? I believe the reason is corporate profit and greed. The State Department must maintain control of the exports of firearms and the Commerce Department should NOT be given this area to oversee. American lives will be put at risk and this is not acceptable!

Barbara Kelly-Greco  
Medford, NJ

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:36 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943n-1r4v
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1525

Public Comment 1340. Individual. Kristine Moore. 7-5-18

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## Submitter Information

**Name:** Kristine Moore

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## General Comment

Please do not switch firearms exports from the State Department to the Commerce Department. This would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:35 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943n-kflu
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1524

Public Comment 1341. Individual. Alexis Ladd. 7-5-18

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## Submitter Information

**Name:** Alexis Ladd

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## General Comment

Please act to prevent the sale of semi-automatic and similar guns to foreign bodies. The U.S. needs to stop being an exporter of violence and these guns do just that. As the overseeing body, you have the opportunity to block the transfer of the oversight of selling arms to the U.S. Commerce Department. As you know, the Commerce Department applies the lens of business development. This approach will work to boost the sales of guns and not regulate them, ultimately putting U.S. citizens in more danger. Creating an environment where people around the world can gain access to these weapons puts more people at risk, including Americans. We're seeing this across the United States with mass shootings happening every day -- so prevalent that they're not making national news anymore. Making more money at the expense of peoples' lives and our national security is wrong. Let the State Department continue to do their job of limiting access to these dangerous weapons.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:34 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943n-8nmX
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1523

Public Comment 1342. Individual. Ryan Houlette. 7-5-18

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## Submitter Information

**Name:** Ryan Houlette

**Address:**

11 Newman St  
Cambridge, MA, 02140

**Email:** houlette@gmail.com

**Phone:** 6179993201

**Fax:** 02140

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Moving the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. This will make the world and the United States less safe.

# PUBLIC SUBMISSION

<b>As of:</b> 7/18/18 9:38 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943o-jiz3
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1522

Public Comment 1343. Anonymous. 7-5-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I strongly oppose the shift of international arms sales from state to commerce department. Please don't do this.

# PUBLIC SUBMISSION

<b>As of:</b> 7/18/18 9:41 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943o-n3je
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1521

Public Comment 1344. Individual. David Greenberg. 7-5-18

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## Submitter Information

**Name:** David Greenberg

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## General Comment

I am against this rule change for a number of reasons. First, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. Furthermore, the rule change would:

1. Eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:31 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943o-j140
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1520

Public Comment 1345. Individual. Janis M Soma. 7-5-18

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## Submitter Information

**Name:** Janis M Soma

**Address:**

Needham, MA, 02492

**Email:** somajanis@comcast.net

**Phone:** 7814442735

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## General Comment

I oppose a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. At this time firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Deadly firearms should not be sold to whoever can pay for them. Our country's priority needs to be human safety, not profitability for firearms manufacturers.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:30 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943o-a9pm
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1519

Public Comment 1346. Anonymous. 7-5-18

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## Submitter Information

**Name:** anonymous anonymous

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## General Comment

Disgusting. Now the criminal NRA supported by president #45 wants to see more murders and expand them worldwide. Don't we have enough death at their hands.  
the NRA needs to be disbanded and made a terrorist group because that is what it is.  
I don't support lay public having guns, they are for the police and military and need to be extremely restricted.  
so NO NO NO NO NO gun exports.  
stop the insanity now.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:27 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943o-8vvy
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1518

Public Comment 1347. Individual. Jack Epling. 7-5-18

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## Submitter Information

**Name:** Jack epling

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## General Comment

This is a bad idea. What are they thinking!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:23 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943o-9r9k
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1517

Public Comment 1348. Individual. Julie Anonymous. 7-5-18

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## Submitter Information

**Name:** Julie Anonymous

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## General Comment

I am writing to you today to express my strong opposition to the proposed rule to transfer oversight of small arms exports from the State Department to the Commerce Department. The Commerce Department prioritizes doing business over safeguarding national security which would make this change far more dangerous for Americans.

We know the US gun industry is faring poorly in today's domestic market, which is why the NRA and the National Shooting Sports Foundation has been lobbying hard to remove congressional oversight of commercial weapon sales of \$1 million or more. No one else asked for it or wanted it.

The NSSF, a gun industry trade group, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobby's influence in the rule's description of semiautomatic assault rifles like the AR-15 as "civilian" products. These weapons were not designed for household use, the were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters.

If you go forwar with this disastrous policy, I will do everything in my power-peacefully and democratically- to hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and drain the swamp.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:21 AM
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<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943o-g0en
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1516

Public Comment 1349. Individual. Martina Leinz. 7-5-18

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## Submitter Information

**Name:** Martina Leinz

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## General Comment

I strongly oppose a rule change switching the regulation of firearms exports from the U.S. Department of State to the U.S. Department of Commerce. This would adversely affect our national security and would destabilize countries around the globe.

The rule change would mean that Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries with serious human rights violations such as the Philippines and Turkey. (The Boston Globe: <https://www.bostonglobe.com/news/politics/2018/06/23/donald-trump-wants-make-foreign-arms-sales-easier/CbCdWIizroV6DjlCIXEVMl/story.html>). It is a blatant effort to enrich the U.S. gun manufacturing industry at the expense of public safety in the United States and around the world.

Martina Leinz  
Burke, Virginia

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:20 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943o-8ht1
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1515

Public Comment 1350. Individual. Margaret Dragonette. 7-5-18

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## Submitter Information

**Name:** Margaret Dragonette

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## General Comment

I oppose the rule change that would switch the regulations of firearm exports from the US State Department to the US Commerce Department. The State Department enforces rigorous restrictions on gun sales overseas because their main purpose is to safeguard our nation. I believe that changing this responsibility to the Commerce Department, whose main purpose is to promote business, would greatly increase the risk of selling guns to terrorists and put American citizens at great risk.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:19 AM
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943o-h17r
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1514

Public Comment 1351. Individual. Dawn Lyons. 7-5-18

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## Submitter Information

**Name:** Dawn Lyons

**Address:**

22 Kellogg Street  
Ridgefield, CT, 06877

**Email:** dawnlyons@mac.com

**Phone:** 513-258-1847

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## General Comment

The rule change could generate a 20 percent increase in exports, sending another 70,000 arms annually into the global marketplace. Please stop this from happening, as we can't afford more gun deaths in this country.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:18 AM
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1513

Public Comment 1352. Individual. Donna W. 7-5-18

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## Submitter Information

**Name:** Donna W.

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## General Comment

I oppose changing fire arms regulations from the State Department, which protects our country, to the Commerce Department,  
which promotes American businesses. We need security!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:17 AM
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<b>Tracking No.</b> 1k2-943p-zsje
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1512

Public Comment 1353. Individual. Julie Fischer. 7-5-18

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## Submitter Information

**Name:** Julie Fischer

**Address:**

712 W Main St  
DECORAH, 52101

**Email:** piscatrix@gmail.com

**Phone:** 5633825695

**Fax:** 52101

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## General Comment

I oppose the proposed rule change that would switch regulation of firearms exports from US State Dept to US Commerce Dept. Such a change would facilitate arms exports to oppressive regimes, open the doors to criminal and terrorist organizations, and further fuel the violence that causes mass migrations. It would enable 3-D gun fabrication with impunity. We need more gun control not less.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:16 AM
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943p-9xdq
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1511

Public Comment 1354. Individual. Jay McCahill. 7-5-18

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## Submitter Information

**Name:** Jay McCahill

**Address:**

219 Scottdale Rd  
Lansdowne, 19050-2328

**Email:** jaymccahill@yahoo.com

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## General Comment

I am vehemently opposed to the proposed transfer of authority for regulating firearms exports from the State Department to the Commerce Department. The sale of weapons has national security and human rights implications that Commerce CANNOT manage, and Congress MUST be informed of and have the ability to block such sales, as they do in the current structure.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:15 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943p-hytd
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1510

Public Comment 1355. Individual. Sally Gibbs. 7-5-18

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## Submitter Information

**Name:** Sally Gibbs

**Address:**

6560 Mockingbird lane

Manssas, 20110 4312

**Email:** Sallygibbs26@gmail.com

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## General Comment

I oppose the transfer of authority for Arms Sales from US State Dept. to the US commerce Dept. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:14 AM
<b>Received:</b> July 05, 2018
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943p-nhoc
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1509

Public Comment 1356. Individual. Yolanda Mitts. 7-5-18

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## Submitter Information

**Name:** Yolanda Mitts

**Address:**

5045 Green Meadow Rd

Kalamazoo, 49009

**Email:** ymitts@yahoo.com

**Phone:** 2693231017

**Fax:** 49009

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Dept to the U.S. Commerce Dept. Firearms exports are classified as "military" and should stay that way. This change would endanger all the citizens of the world.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:13 AM
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943q-gfvu
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1508

Public Comment 1357. Individual. William Skirbunt-Kozabo. 7-5-18

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## Submitter Information

**Name:** William Skirbunt-Kozabo

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## General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe

I strongly urge you to oppose this rule.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:12 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943q-7g5c
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1507

Public Comment 1358. Individual. Lisa Graham. 7-5-18

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## Submitter Information

**Name:** Lisa Graham

**Address:**

1821 windemere ave  
madison Heights, 48071

**Email:** lgraham@medcerts.com

**Phone:** 2488843524

**Fax:** 48071

---

## General Comment

switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Please keep the current regulations and make them stronger not weaker

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:09 AM
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<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943q-tfe9
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1506

Public Comment 1359. Anonymous. 7-5-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Let's not make it easier for U.S. gun manufacturers to export more firearms into a dangerous world filled with terrorists anxious to use them against us.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:08 AM
<b>Received:</b> July 05, 2018
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943q-o5y9
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1505

Public Comment 1360. Individual. Mary McCullough. 7-5-18

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## Submitter Information

**Name:** Mary McCullough

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## General Comment

Opposed to proposed rule:

I'm extremely concerned about the rollback of these regulations. In particular the ease it would ability to use a 3D printer to create firearms. Although, criminals can do it now, it would remove prohibitions and provide easy access making traveling unsafe as they are not visible going through TSA.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:07 AM
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<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943q-ezp9
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1504

Public Comment 1361. Individual. Robert Duke. 7-5-18

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## Submitter Information

**Name:** Robert Duke

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## General Comment

Please stop this rule, it puts civilians in danger of being shot and killed.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 3:22 PM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943q-luf1
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1503

Public Comment 1362. Individual. Alana DeJoseph. 7-5-18

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## Submitter Information

**Name:** Alana DeJoseph

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## General Comment

I strongly oppose the rule change which would move the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Congress no longer being automatically informed about sizable weapons sales so that it could monitor or stop them in the name of national security, (especially in the case of sales to countries where there are serious human rights concerns, such as the Philippines and Turkey), is unconscionable, short-sighted, and greedy, at the expense of the security for future generations.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:05 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943r-396u
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1502

Public Comment 1363. Individual. Howard Mielke. 7-5-18

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## Submitter Information

**Name:** Howard Mielke

**Address:**

3233 DeSoto Street

New Orleans, LA, 70119

**Email:** howard.mielke@gmail.com

**Phone:** 5049883889

**Fax:** 70119

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## General Comment

For the following reasons I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department:

\*It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

\*It would remove licensing requirements for brokers, increasing the risk of trafficking.

\*It would remove the State Departments block on the 3D printing of firearms, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:04 AM
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<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943r-uuos
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1501

Public Comment 1364. Individual. Jacqueline Eliopoulos. 7-5-18

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## Submitter Information

**Name:** Jacqueline Eliopoulos

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## General Comment

Please reject this rule change entirely. It would only serve to make our violent world more dangerous and put our own nation as well as all others at even greater risk of harm. It is a stupid and reckless choice that will only serve to put all humanity in greater danger. For the sake of all humanity reject this proposal.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:03 AM
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943r-4bq4
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1500

Public Comment 1365. Individual. Ana Santoyo. 7-5-18

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## Submitter Information

**Name:** Ana Santoyo

**Address:**

1230 Astor St  
Norristown, PA, 19401

**Email:** Anasan19119@yahoo.com

**Phone:** 2157049715

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## General Comment

Do not change the regulation of firearms exports from the State Department to the Commerce Department to facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

If anything we need to reduce the number of guns and other weapons available in the US and the world.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:02 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943r-ddgz
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1499

Public Comment 1366. Individual. Randall Wayne. 7-5-18

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## Submitter Information

**Name:** Randall Wayne

**Address:**

2720 Onyx St.  
Eugene, OR, 97403

**Email:** rushwayne@aol.com

**Phone:** 5413426144

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Firearms exports are currently classified as military. They are under the regulation of the State Department, allowing Congress to block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Moreover, the Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 11:01 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943r-t568
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1498

Public Comment 1367. Individual. Lauren Hayman. 7-5-18

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## Submitter Information

**Name:** Lauren Hayman

**Address:**

Brooklyn, NY,

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This rule change will make the U.S. and the World a MUCH more dangerous place.

As a new mother, I do not want my child growing up in fear. I currently have faith in the State Departments Blue Lantern program that carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. This new rule will remove those licensing requirements for brokers, increasing the risk of trafficking.

It is also frightening that it will remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please DO NOT change this rule. The current rules keep us safe in this already very dangerous world of guns and firearms.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 10:55 AM
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<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943r-6ja5
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1497

Public Comment 1368. Individual. Cecile Heatley.7-5-18

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## Submitter Information

**Name:** Cecile Heatley

**Address:**

1905 Youngblood street

McLean, 22101-5531

**Email:** cecileheatley@gmail.com

**Phone:** 7034488790

**Fax:** 22101-5531

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## General Comment

I strongly protest against switching the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

The Commerce Department does not have the resources to effectively enforce export controls. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face fewer hurdles to getting large quantities of American guns and ammunition.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Changing oversight and regulation of firearms would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D-printing of firearms. When Defense Distributed founder

Cody Wilson posted online instructions for how to 3D-print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

This is a dangerous, ill-considered, profit-driven move that produces revenues for the NRA and increases the likelihood of injuries and deaths.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 10:54 AM
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<b>Tracking No.</b> 1k2-943r-xhgu
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1496

Public Comment 1369. Individual. Allison Canning. 7-5-18

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## Submitter Information

**Name:** Allison Canning

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I believe it would make the US & other countries less safe.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 10:52 AM
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943s-xc35
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1495

Public Comment 1370. Individual. Stanley Swiecz. 7-5-18

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## Submitter Information

**Name:** Stanley Swiecz

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## General Comment

Too many enemies of the United States already have powerful weapons to use against our soldiers and citizens. Exports are not just a commercial concern, they are a security and diplomatic concern. Please keep export decisions under the control of the State Department with it's multidimensional perspective.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 10:51 AM
<b>Received:</b> July 05, 2018
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943s-o9t3
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1494

Public Comment 1371. Individual. Stephanie Angelo. 7-5-18

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## Submitter Information

**Name:** Stephanie Angelo

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## General Comment

The only sensible thing is to ban bump stocks and military style weapons from the general public! Please. It won't solve everything thing but it WILL solve a lot.

Please do the right thing. Not the money thing.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 10:50 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943s-6yk3
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1493

Public Comment 1372. Individual. Erin Orozco. 7-5-18

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## Submitter Information

**Name:** Erin Orozco

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## General Comment

Right now, firearms exports are classified as military, putting them under the regulation of the State Department and allowing Congress to block large sales of firearms to foreign countries. Under the Bureau of Industry and Security's (BIS's) proposed rule change, the handling of export licenses of semiautomatic assault weapons and other powerful firearms would shift from the State Department (focused on safeguarding our nation) to the Commerce Department (focused on promoting American business). This means Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey, which would open new floodgates for arms sales internationally with serious implications for our national security.

The Commerce Department simply does not have the resources to adequately enforce export controls. BIS does not have appropriate staffing levels to monitor and regulate firearms exports on the level that they deserve, given their import to our national security. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 10:49 AM
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943s-l6jo
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1492

Public Comment 1373. Individual. Lauri Elliot. 7-5-18

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## Submitter Information

**Name:** Lauri Elliot

**Address:**

221 Tupelo Rd.

Naples, FL, 34108

**Email:** laurielliot@aol.com

**Phone:** 239-272-9117

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## General Comment

I oppose this rule change which would switch the regulating of the exporting of firearms from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

In short, such a rule change would make the world a far more dangerous place and this should be avoided at all costs!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 10:48 AM
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943s-ds5n
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1491

Public Comment 1374. Individual. Anita Lendway. 7-5-18

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## Submitter Information

**Name:** ANITA LENDWAY

**Address:**

6155 W. Warwick Ave.

CHICAGO, IL, 60634

**Email:** alendway6155@comcast.net

**Phone:** 7735457544

**Fax:** 60634

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## General Comment

I OPPOSE the rule change that would switch regulation of firearm exports from the U.S. State Department to the US. Commerce Department. The Commerce Department doesn't have the resources to enforce export controls. Congress needs to be informed about large firearm sales to foreign countries. We must protect national security.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:37 AM
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<b>Status:</b> Posted
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<b>Tracking No.</b> 1k2-943s-7qp2
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1440

Public Comment 1375. Individual. Jan Weisel. 7-5-18

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## Submitter Information

**Name:** Jan Weisel

**Address:**

18513 NE 159th ST

Woodinville, WA, 98072

**Email:** weiscon@comcast.net

**Phone:** 206 714-4904

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Because of these reasons, this rule change must not be implemented.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:34 AM
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943s-tlrs
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1438

Public Comment 1376. Individual. Herschell Emery. 7-5-18

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## Submitter Information

**Name:** Herschell Emery

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## General Comment

I oppose strongly this rule change, which would (I believe most intentionally!) weaken US regulation of firearm exports. Weapons of war are far from just an issue to be monitored weakly by a Commerce Department uninformed of what international impacts arms sale overseas will have. Is the world no longer dangerous...just a fertile sales ground for the arms industry? Do we want the NRA setting policy for where we ship arms? Do we want a department without strong arms enforcement capabilities to be the only agency watching for arms traffickers? Leave arms classified as such--"military"--so that the State Department and Congress will retain oversight!!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:33 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943s-ihcw
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1437

Public Comment 1377. Individual. Valerie Wald. 7-5-18

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## Submitter Information

**Name:** Valerie Wald

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## General Comment

This rule change would make the world a far more dangerous place.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

More specifically, this rule change would:

- Eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- Remove licensing requirements for brokers, increasing the risk of trafficking.
- Remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:32 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943t-xbcm
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1435

Public Comment 1378. Individual. Fred Fall. 7-5-18

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## Submitter Information

**Name:** Fred Fall

**Address:**

106 Uxbridge

Cherry Hill, NJ, 08034

**Email:** fred08034@gmail.com

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## General Comment

The State Department should continue to exercise their authority in this matter. It is essential to public safety and security that firearms continue to be controlled under the United States Munitions List.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:31 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943t-ltp2
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1434

Public Comment 1379. Individual. Carolyn Roney. 7-5-18

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## Submitter Information

**Name:** Carolyn Roney

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## General Comment

I strongly oppose the proposed rule to move regulation and oversight of firearms (small arms) exports from the State Department to the Commerce Department. An agency that prioritizes doing business over safeguarding national security has no business controlling the sale of small arms. In addition, it's truly crazy to eliminate congressional oversight of commercial weapons sales of \$1 million or less. The obvious intent here is to increase sales for the faltering U.S. gun industry, at the expense of our national security. This is completely unacceptable. If this dangerous policy is implemented, U.S. national security is in jeopardy, as well as the safety of people around the world. Please think through the long-term implications of this change, none of which are good.

Thank you for your time and attention.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:30 AM
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<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943t-p5c0
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1421

Public Comment 1380. Individual. Lucy Krasnor. 7-5-18

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## Submitter Information

**Name:** Lucy Krasnor

**Address:**

Riverside, CT, 06878

**Email:** lucy@strategymortgage.com

**Phone:** 2036184144

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## General Comment

I strongly urge the Commerce Dept ad the State Dept to oppose relaxing rules that would make it easier for US firearm manufacturers to export assault rifles and other guns with less oversight and accountability. we should be making it harder and not easier to get guns- guns are meant to kill people in war and war alone. please do not change the regulations to relax the sale of guns abroad. thank you.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:21 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943t-sjj7
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1419

Public Comment 1381. Individual. Patricia Johnson. 7-5-18

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## Submitter Information

**Name:** Patricia Johnson

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## General Comment

The Commerce Department has no way of checking on these sales. Why should gun sales be allowed to any single person, companies or countries by private gun companies? There would be no check on these. Does our country want terrorists having more weapons against us? Remember the Fast and Furious Program where guns were sold to suspected marijuana bandits and ATF agents lost track of them. As a result a Border Patrol agent was killed with one of those same guns. If the ATF knowing who they sold these guns to lost track, how would the Commerce Department keep track of who is purchasing guns? How would our allies look at this? We could be selling guns that would cause more killings in their countries. Is this a proposal to increase profits for gun companies? What has happened to common sense and morality?

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:20 AM
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943t-16js
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1417

Public Comment 1382. Individual. SHanti Toll. 7-5-18

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## Submitter Information

**Name:** SHanti Toll

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## General Comment

Guns allow for more killing and violence toward all people and USA. PLEASE place people over profit.

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:19 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943t-spmr
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1415

Public Comment 1383. Individual. Sadie Sullivan-Greiner. 7-5-18

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## Submitter Information

**Name:** Sadie Sullivan-Greiner

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## General Comment

The NRA is a corporate organization focused on one thing only: How much profit they can make from the sale of weapons. As it happens, I spent part of my career working in the ordnance world at DoD. I also live on the southern border.

The notion that ANY foreign military sales should be released to the Dept of Commerce is ludicrous. Much of the gun violence we deal with is a direct result of US weapons going over the border, to arm the drug cartels, who then create the violence in our cities associated with the drug trade. No sane person would want to increase that.

Weapons sales of any sort need to be housed in the State Dept. To do otherwise is self-defeating.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:18 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
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<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1412

Public Comment 1384. Individual. Peggy Walsh. 7-5-18

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## Submitter Information

**Name:** Peggy Walsh

**Address:**

444 Stockham Ave  
Morrisville, PA, 19067

**Email:** peggywalsh65@gmail.com

**Phone:** 2673046353

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## General Comment

Comment:I am deeply opposed to this proposed change to arms and traffic regulation. It is the last thing this country or the worlds needs. It is scam to line more pockets.

- 1.It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
- 2.It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
- 3.It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:17 AM
<b>Received:</b> July 05, 2018
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943t-q13c
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1410

Public Comment 1385. Anonymous. 7-5-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We need safe guards in place to ensure that large quantities of weapons are not being shipped to countries with dangerous regimes. Congress must continue to be notified when large quantities of weapons are sold and shipped and where they are going. The Commerce Department lacks the controls necessary to ensure that the United States remains a conscientious global citizen.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:15 AM
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<b>Tracking No.</b> 1k2-943t-qy7c
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1409

Public Comment 1386. Anonymous. 7-5-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

To Whom it May Concern,

I'm deeply concerned about the Proposed Rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department.

The State Department's focus is safeguarding our nation  
The Commerce Department's focus is on promoting American business

While the current administration has made it abundantly clear that US exports, and supporting large business is a TOP priority, the same administration has also named national security as a TOP priority, making MASSIVE changes to immigration policies and imports/tariffs under that guise. I fail to see how reducing regulations on exporting firearms DOESN'T affect national security.

This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security: facilitate firearms exports to oppressive regimes, remove safeguards that help keep organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. How are any of those things in the best interest of our country? And doesn't nation security always come first? For example, the Defense Department has the largest slice of the US budget! And the president has tremendous powers to act in the name of national security (e.g., current travel ban), that are not available to promote business for a reason. So again, I fail to see how this proposed rule protects the national interests of this country. So while I understand that gun and weapons manufacturers would 'win' with this change, it does NOT put our security first, nor does it put the American people first.

With respect,

D

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:14 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943t-6rhh
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1408

Public Comment 1387. Individual. Kathleen Green. 7-5-18

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## Submitter Information

**Name:** Kathleen Green

**Address:**

12545 Wedgwood Circle

Tustin, CA, 92780

**Email:** kathleenrgreen7@gmail.com

**Phone:** 949-862-7334

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## General Comment

I am against the rule change that would move the handling of export licenses of semiautomatic assault weapons and other

powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department

(focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales

internationally, with serious implications for our national security.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry

and Security does not have staff everywhere. This means that firearms traffickers organized crime, terrorist organizations

and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Is the Trump Administration ready to support terrorist and organized crime in this manner? Is Trump ready to see more people

die to serve his NRA masters?

The world needs less guns not more and much, much stricter regulations and safety laws.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:13 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943u-9v4n
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1405

Public Comment 1388. Individual. Julia Michalak. 7-5-18

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## Submitter Information

**Name:** Julia Michalak

**Address:**

209 NW 48th St

Seattle, 98107

**Email:** jmichalak@gmail.com

**Phone:** 2024868782

**Fax:** 98107

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Exporting military grade weapons without congressional or diplomatic review opens the door to allowing US companies to provide arms to authoritarian governments, terrorists and other unethical entities. The sale of semi-automatic weapons of war is not simply a business decision, it is 100% an ethical and diplomatic decision that requires oversight from US government - and not just the commerce department, which does not have the expertise or resources to adequately evaluate these sales. The United States absolutely should not be selling weapons of war without substantial oversight from elected officials and staff with the expertise to evaluate the human rights and diplomatic implications of these sales.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:12 AM
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943u-2dgv
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1404

Public Comment 1389. Individual. Margaret Hasselman. 7-5-18

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## Submitter Information

**Name:** Margaret Hasselman

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## General Comment

Firearms, guns and ammunitions MUST be regulated, and must NOT be pushed for export. There are too many guns finding their way into the wrong hands already. Stop this horrible trade now!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:11 AM
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<b>Tracking No.</b> 1k2-943u-5vju
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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1402

Public Comment 1390. Individual. Donna Whitehead. 7-5-18

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## Submitter Information

**Name:** Donna Whitehead

**Address:**

4540 Village Dr SE  
Olympia, WA, 98501

**Email:** whiteheaddz2@gmail.com

**Phone:** 360 481-1983

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## General Comment

The NRA is pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department . This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Please do not cave to this request.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:10 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943u-7jer
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1400

Public Comment 1391. Individual. Mary Harrison. 7-5-18

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## Submitter Information

**Name:** Mary Harrison

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## General Comment

I strongly oppose changing the regulation of exporting firearms from the State Department to the Commerce Department. The exporting of firearms should remain a "military" concern overseen by the State Department, because the sale of firearms to other countries can easily become a danger to the security of our own country and of other countries in the world through the acquisition of firearms by firearms traffickers, terrorist organizations, and organized crime.

The State Department has more comprehensive resources than the Commerce Department to enforce export controls on firearms.

It's clear in our own country that easy access to firearms now threatens all children in our schools. It makes no sense to make it easier for firearms from our country to be used against us, or against other countries, because of lax enforcement of controls. Keep the regulation of exporting firearms under the control of the State Department, where it can be monitored more closely.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:09 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
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<b>Tracking No.</b> 1k2-943u-wanw
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1399

Public Comment 1392. Individual. Jeanine Moyer.7-5-18

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## Submitter Information

**Name:** Jeanine Moyer

**Address:**

22 Long Ave

Buffalo, NY, 14225

**Email:** alianna2018@yahoo.com

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The U.S. State Department is focused on safeguarding our nation, while the U.S. Commerce Department is focused on promoting American business. This transfer of authority could open new floodgates for arms sales internationally, with serious implications for our national security. Switching the regulation of firearms exports from the State Department to the Commerce Department would could lead to firearms exports to oppressive regimes, removing safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:07 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943u-obhn
<b>Comments Due:</b> July 09, 2018
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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1397

Public Comment 1393. Individual. Yvonne Greenbaum. 7-5-18

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## Submitter Information

**Name:** Yvonne Greenbaum

**Address:**

1168 garraty

Terrell Hills, TX, 78209

**Email:** greenbaumyvonne@yahoo.com

**Phone:** 2103255781

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## General Comment

This is a backdoor attempt by the NRA to make gun movement easier and less transparent. This should not be allowed to happen. This is another wrong policy change by a totally corrupt administration.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:06 AM
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1396

Public Comment 1394. Individual. Alyce Dodge. 7-5-18

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## Submitter Information

**Name:** Alyce Dodge

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## General Comment

I oppose switching the regulation of firearms exports from the U. S. Department of State to the U. S. Department of Commerce.

There are many good reasons why firearms exports are classified as military and are closely regulated under the Department of State, with Congress given notifications of sizable weapons sales to foreign countries and the ability to block these sales for national security.

The Department of State provides needed gun export oversight, which the Department of Commerce does not have the resources to do. Enforcing the current regulations prevents firearms traffickers, terrorist groups, organized crime, and oppressive regimes from obtaining large caches of American guns and ammunition.

However, if gun export licensing is moved to the Department of Commerce, Congress would not be informed automatically of notable arms sales, and safeguards would be removed so that dangerous agents could more easily obtain semiautomatic assault weapons and other powerful firearms, and this opens the floodgates for destabilizing violence around the world.

The handling of export licenses of assault weapons is properly under the Department of State, which is focused on safeguarding our nation. The Department of Commerce, with its focus on promoting American business, is not the suitable agency for regulating arms exports.

I read somewhere Those who live by the sword, die by the sword. Exporting weapons around the world is not an ordinary business like exporting food or solar technology. For the sake of children everywhere, lets do all we can to prevent violence and the suffering it causes.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:05 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943u-ue91
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1395

Public Comment 1395. Individual. Christine Zimmerman. 7-5-18

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## Submitter Information

**Name:** Christine zimmerman

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## General Comment

I am very concerned about this Proposed rule change. This has the potential to have serious impact our national security. Business should not be the priority over the safety of Americans.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:04 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943v-9my0
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1394

Public Comment 1396. Individual. K. Young. 7-5-18

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## Submitter Information

**Name:** K. Young

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are not traditional commercial goods and shouldn't be treated as such. There is no good reason to make it easier for manufacturers to export firearms to other countries, to remove licensing requirements for brokers or to remove the block on the 3D printing of firearms. This is a dangerous rule change and it should be rejected.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:03 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943v-iwr9
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1393

Public Comment 1397. Individual. Bill Chockla. 7-5-18

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## Submitter Information

**Name:** Bill Chockla

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## General Comment

Hello,

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department! It is bad enough this country leads the way in allowing "poison for profit" in so many of our consumer goods. All in the name of capitalism, greed, ignorance, arrogance. Now we want to add firearms world wide?! This is pure insanity! Just look at how sick the domestic terrorist murders are in the states today. This will open the door for ALL countries to "enjoy" the murders while the "good, rich, white, conservative christians" roll in more profits! Pro-life? I think not! Pro CULT is all they really are! Studying the ORIGINS of their cult PROVES they are the ones we need to STOP! NOW! So, PLEASE! Do NOT allow these regulation changes!!

Regards,  
Bill

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:02 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943v-p7ny
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1392

Public Comment 1398. Individual. Loren Kollmar. 7-5-18

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## Submitter Information

**Name:** Loren Kollmar

**Address:**

1801 Taylor St NE  
Minneapolis, MN, 55418

**Email:** verucht@yahoo.com

**Phone:** 5074090067

**Fax:** 55418

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## General Comment

I am in opposition to this proposed change. I am not anti gun, but I don't think flooding the world with more guns is responsible or sensible. There are enough loop holes currently existing to negate this change.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:00 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943v-byed
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1391

Public Comment 1399. Individual. Rahel Ruiz. 7-5-18

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## Submitter Information

**Name:** Rahel Ruiz

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## General Comment

I am writing to oppose the move of weapons sales and licensing from the State Department to the Department of Commerce.

Here are several reasons:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

In addition, the Commerce department does not have the resources to effectively enforce export controls. This transfer is bad for the U.S. and is bad for the world.

Thank you,

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:59 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943v-6gsb
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1390

Public Comment 1400. Individual. Suzanne Lander. 7-5-18

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## Submitter Information

**Name:** Suzanne Lander

**Address:**

445 Surrey Run  
Casselberry, FL, 32707

**Email:** selander1@earthlink.net

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Don't we have enough people dying from these killing machines???

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:58 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943w-861g
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1389

Public Comment 1401. Individual. John Douglas. 7-5-18

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## Submitter Information

**Name:** John Douglas

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## General Comment

I strongly oppose this proposed Bureau of industry and Security rule change.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:57 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943w-aub6
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1388

Public Comment 1402. Individual. Carolyn Scoppettone. 7-5-18

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## Submitter Information

**Name:** Carolyn Scoppettone

**Address:**

11 Foster Street  
Montpelier, 05602

**Email:** ccoryvt@yahoo.com

**Phone:** 8022291350

**Fax:** 05602

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## General Comment

I strongly oppose this change. Clearly recent events have demonstrated that we need stricter control of firearms.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:56 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943w-7hxq
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1387

Public Comment 1403. Individual. Rina Schneur. 7-5-18

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## Submitter Information

**Name:** Rina Schneur

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## General Comment

I am writing in strong opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce. The proposed rule change treats semiautomatic assault rifles as non-military. Firearms are used to kill thousands of people every day around the world in acts of organized crime, street crime, political violence, terrorism, and myriad human rights violations. They should be subject to more controls, not fewer.

Injecting military used firearms into our everyday life puts all of us, and especially our youth and children into greater unnecessary danger.

Rina Schneur

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:55 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943w-4d5q
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1386

Public Comment 1404. Individual. Genne and Rita Collins. 7-5-18

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## Submitter Information

**Name:** Genne and Rita Collins

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## General Comment

I strongly OPPOSE changing regulation of firearms exports from the State Department to the Department of Commerce. This change would make our country and the world more dangerous in many ways:

It could result in more weapons on the street - certainly we have enough illicit use guns. I believe it would result in increased weapons at home and abroad and restrict The State Department's oversight of many current activities.more weapons domestically and internationally.

It would remove licensing requirements for brokers.

It stops the program that inspects pre-license guns and issues reports.

We do not see the need switch control of firearms exports unless it is to pay for firearms lobbyists. Please do not approve this move

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:55 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943w-npk0
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1385

Public Comment 1405. Individual. Elisabeth King. 7-5-18

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## Submitter Information

**Name:** Elisabeth King

**Address:**

23 Greymre Rd

Brighton, MA, 02135

**Email:** bking32@aol.com

**Phone:** 617-787-0165

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## General Comment

To Secretary of Commerce Mr. Wilbur Ross:

I am registering my dismay at any efforts to increase export of munitions, especially to Mexico, Central America and to any nation that is at all politically unstable. Mexico is the country that I know most about because I volunteer with Greater Boston Trade Justice, a group of citizens in eastern MA working to improve NAFTA. However the dynamics in all these countries are similar.

Access to weapons is critical to the survival of drug cartels, so they love America's current lax gun laws. 70% of guns recovered in crimes in Mexico can be traced to the USA. High caliber rifles are preferred. (Ingraham, Christopher. Why Mexico's Drug Cartels Love America's Gun Laws. Washington Post. Jan. 14th 2016)

At present guns and cash are transported illegally overland along the same routes that drugs are transported north. How much easier would it be if the money obtained from drug sales were to be spent on guns legally imported into their own country? Given the cartels' level of infiltration into local and even federal government, laws regulating legal sales are very weak. (McKibbin, Cameron. Council on Hemispheric Affairs research associate, NAFTA and Drug Trafficking: Perpetuating Violence and the Illicit Supply Chain. COHA publication. March 20, 2015)

Violence related to drug trafficking is currently a huge cause of fear for life in Mexico and Central America.

Thus the problem of aliens illegally crossing the border into USA is exacerbated.

Given these facts, how does increasing firearms exports even make sense if you at the same time want to decrease illegal immigration?

In addition, how is this deregulation different than the Fast and Furious program, in which Border Patrol Agent Brian Terry was killed in December 2010? That program was rightly criticized, especially by politicians on the right side of the aisle. But that program at least tried to actually fight criminal activity. Deregulating gun exports would only increase it.

Please reconsider this deregulation.

Sincerely,

Elisabeth King

23 Greymere Rd. Brighton, MA 02135

Sent from AOL Desktop

Liz King 617-787-0165, 857-225-0396 Bking32@aol.com

Greater Boston Trade Justice FB: Greater Boston Trade Justice

Ezekiel cried out to the King of Tyre, in the abundance of your trade you were filled with violence and you sinned (28:16)



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:53 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943w-t2ac
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1384

Public Comment 1406. Individual. Jane Knight. 7-5-18

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## Submitter Information

**Name:** Jane Knight

**Address:**

1770 North St.

East Montpelier, VT, 05602

**Email:** jane@bearpondbooks.com

**Fax:** 05602

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## General Comment

This is an NRA-backed action that would overload the Commerce Dept, and potentially have far-ranging destabilizing effects around the world, since large weapons sales to countries that commit human rights violations would no longer be watched by Congress. This is a very dangerous potential rule change. Do NOT give in to our traitorous and homegrown terrorist organization-- the NRA!!!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:53 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943w-33jp
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1383

Public Comment 1407. Anonymous. 7-5-18

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## Submitter Information

**Name:** anonymous Anonymous

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the US State Department to the US Commerce Department.

Now, firearms exports are classified as "military." That is why they are under the regulation of the State Department and why Congress can block sales of large batches of semiautomatic assault weapons and other powerful firearms to foreign countries.

If you change the rule and allow Commerce to handle this--Congress will no longer be automatically informed about sizable weapons sales, the kind that should be stopped for reasons of national security. The Commerce Dept. does not have the resources to adequately enforce export controls. Your Bureau of Industry and Security does not have the necessary staff in place to provide oversight.

This will mean that firearms traffickers, organized crime and terrorist organizations, as well as many other violent and dangerous groups will face far fewer hurdles to their obtaining of large caches of American gun and ammunition. Transferring of export licenses of weapons to the Dept of Commerce will open the floodgates for arms sales internationally, and this will have serious implications for our national security.

I don't think the Department of Commerce should be in charge of the export licenses for guns, for reasons of American safety and security.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:51 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943w-jyzj
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1382

Public Comment 1408. Individual. Jay Unger. 7-5-18

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## Submitter Information

**Name:** Jay Unger

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## General Comment

Automatic and Semi-Automatic Weapons whether currently available in the U.S. from commercial dealers are primarily weapons of war designed to kill people with maximum efficiency. Reclassifying these exports as non-military and subjecting them to less scrutiny when sold outside the U.S. is dangerous both to human life and the U.S. foreign policy interests. Imagine the outrage that will be levied at the U.S. by allies and/or others if such weapons become as easily and inexpensively available abroad as they are presently in the U.S. where they have been shown to encourage gun violence and even mass murder in schools, shopping centers, concert venues, etc. Continuing to apply more scrutiny and higher export registration fees will discourage U.S. manufacturers of such weapons from offering them commercially abroad.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:50 AM
<b>Received:</b> July 05, 2018
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943w-nc0t
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1381

Public Comment 1409. Individual. Katherine Cote. 7-5-18

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## Submitter Information

**Name:** Katherine Cote

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## General Comment

Firearms exports must continue to be classified as military so that they are under the regulation of the State Department, and so that Congress can block sales of large batches of firearms to foreign countries. If firearms are not classified as "military", Congress would no longer be automatically informed about sizable weapons sales and could not stop them in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

This would be dangerous to the US and to the world.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:49 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943x-4vvo
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1380

Public Comment 1410. Individual. Mark Anderson. 7-5-18

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## Submitter Information

**Name:** Mark Anderson

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## General Comment

Dear Sir or Madam:

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

As you likely know, this rule change would, among other things:

- (a) eliminate the State Department's Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- (b) remove licensing requirements for brokers, increasing the risk of trafficking.
- (c) remove the State Department's block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please do not move forward with this rule change.

Sincerely,

Mark and Candace Anderson

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:48 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943x-f3qd
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1379

Public Comment 1411. Individual. Mary Canales. 7-5-18

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## Submitter Information

**Name:** Mary Canales

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## General Comment

I oppose the proposed rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Currently, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Meanwhile, the Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! As a public health nurse and a citizen concerned about human rights and global health, I strongly oppose the proposed rule change.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:47 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
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<b>Tracking No.</b> 1k2-943x-tlfl
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1378

Public Comment 1412. Individual. Jen Manders. 7-5-18

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## Submitter Information

**Name:** Jen Manders

**Address:**

1990 Ellis

Dubuque, 52001

**Email:** jlmanders@aol.com

**Phone:** 5635565713

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## General Comment

Please keep ITAR governance under the US State department.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:46 AM
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<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943x-tzcr
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1377

Public Comment 1413. Individual. Karen Anonymous. 7-5-18

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## Submitter Information

**Name:** Karen Anonymous

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## General Comment

I object to control over firearm sales being, essentially, relegated to the industry. We need more oversight and stricter controls, not less control and weakened oversight. Please do not let the profit motives overcome common sense, and vote down this proposed rule.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:45 AM
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<b>Tracking No.</b> 1k2-943x-dsf2
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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1376

Public Comment 1414. Individual. Rev. Phoenix Hawelu-Hills. 7-5-18

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## Submitter Information

**Name:** Rev. Phoenix Hawelu-Hills

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## General Comment

Why would we change how guns are handled by our government? We need to keep the U.S. State Department in charge of the selling and exporting of dangerous things like guns and weapons because it is the job of the U.S. State Department to safeguard our country! Changing the department that safeguards our country to the U.S. Commerce Department would be outrageous and unsafe!

Firearms are dangerous!! They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They are used to kill U. S. citizens daily. We need MORE controls on how these weapons are acquired!

They should be subject to far more controls, not less!

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Do not change how guns and weapons are classified! They are classified as "military" because that is how we

keep our  
country safe! This is why they are under the regulation of the State Department!!

Please keep us safe. Don't let big business control how many of our enemies have weapons because they don't  
care about  
our lives!!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:44 AM
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943x-mtwo
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1375

Public Comment 1415. Individual. Rita Kain. 7-5-18

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## Submitter Information

**Name:** Rita Kain

**Address:**

219 Bates Street  
Earlville, IL, 60518-8133

**Email:** tasc88@sbcglobal.net

**Phone:** 815-246-9370

**Fax:** none

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## General Comment

I don't feel your department has the qualifications nor the ability to make sure these weapons don't end up in terrorists, or enemy government hands. Yours is an agency tasked with improving commerce between countries. NOT securing the people of the United Staes!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:43 AM
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943x-hgzc
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1374

Public Comment 1416. Individual. Vicki Shelton. 7-5-18

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## Submitter Information

**Name:** Vicki Shelton

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## General Comment

Guns must be limited. The Department of State will do a better job than the department of Commerce.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:42 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943y-mwk0
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1373

Public Comment 1417. Individual. Rebecca B. Wilk. 7-5-18

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## Submitter Information

**Name:** Rebecca B. Wilk

**Address:**

P.O. Box 1395  
Woodstock, NY, 12498

**Email:** rbw4peaceandfreedom@gmail.com

**Phone:** (845) 679-4712

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## General Comment

Please do NOT promote gun manufacturers' profits at the expense of people's lives.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:40 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-943y-wzc9
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1372

Public Comment 1418. Individual. Kerry Wiessmann. 7-5-18

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## Submitter Information

**Name:** Kerry Wiessmann

**Address:**

162 Limerock Terrace  
State College, PA, 16801

**Email:** kgw11@scasd.org

**Phone:** 814-238-1764

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## General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State

Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[3]

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.[4]

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.[5] The export of these weapons should be subject to more controls, not less.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:39 AM
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1371

Public Comment 1419. Individual. Michael Monroe. 7-5-18

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## Submitter Information

**Name:** Michael Monroe

**Address:**

15 Weybridge Rd.

Brookline, 02445

**Email:** mmonroe@bidmc.harvard.edu

**Phone:** 6177844836

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## General Comment

The State Department must continue to regulate the export of firearms. The role of the State Department is to interact with other countries in a way that protect American interests and the interests of other nations. As possible agents of death, firearms can compromise both American and foreign security. The State Department has a compelling interest in preventing, or at the very least overseeing, the sale of firearms. Please do not turn over this authority to the Department of Commerce, whose focus is business, not security or diplomacy. Furthermore, the Department of Commerce does not have the resources to police the sale of firearms adequately.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:38 AM
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<b>Tracking No.</b> 1k2-943y-4cai
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1370

Public Comment 1420. Individual. Darien Gardner. 7-5-18

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## Submitter Information

**Name:** Darien Gardner

**Address:**

51 Pilgrim Dr.  
Northampton, MA, 01060

**Email:** [darien@crocker.com](mailto:darien@crocker.com)

**Phone:** (413) 586-7697

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## General Comment

To the U.S. Commerce Department,

I am writing to express my opposition to any rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

I believe such a rule change would be extremely unwise because the State Department has the facilities needed to prevent guns from falling into the hands of organized criminals, political extremists, terrorists and human rights violators around the world. The Commerce Department is much less well equipped to do this.

Sincerely,  
Darien Gardner

Darien Gardner  
51 Pilgrim Dr.  
Northampton, MA 01060

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:37 AM
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<b>Posted:</b> July 17, 2018
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<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1369

Public Comment 1421. Individual. A. Pierce. 7-5-18

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## Submitter Information

**Name:** A. Pierce

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## General Comment

oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This change in the administration of gun sales will create a fundamentally more violent and unsafe world both inside and outside of the U.S.

This change would:

- 1.eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them
- 2.remove licensing requirements for brokers, increasing the risk of trafficking
- 3.remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe

For these reasons I strongly oppose this regulatory change in arms sales.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:36 AM
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1368

Public Comment 1422. Individual. Mark Schumerth. 7-5-18

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## Submitter Information

**Name:** Mark Schumerth

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## General Comment

I oppose transferring arms regulation to the Dept. of Commerce. This would open the door to even more arms trafficking than we already have. I find it stupefying that POTUS Trump, who spends most of his time complaining about arms trafficking across the border, would support such a move. It must be stopped!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:34 AM
<b>Received:</b> July 05, 2018
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<b>Tracking No.</b> 1k2-943y-45md
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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1367

Public Comment 1423. Individual. Jodi-Beth McCain. 7-5-18

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## Submitter Information

**Name:** Jodi-beth McCain

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Please do not make any changes.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:33 AM
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<b>Tracking No.</b> 1k2-943y-26ej
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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1366

Public Comment 1424. Individual. Matthias Hess. 7-5-18

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## Submitter Information

**Name:** Matthias Hess

**Address:** United States,

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## General Comment

I strongly oppose any rule changes to give authority over arms exports to the U.S. Commerce Department. I worry that the Commerce Department would push weapons sales abroad, driving deadly conflicts even more than they already do. The State Department's mission is to protect our country, and they authority over firearms exports in order to do so effectively.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:32 AM
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<b>Tracking No.</b> 1k2-943z-tdaz
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1365

Public Comment 1425. Anonymous. 7-5-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

The NRA and gun manufacturers should not push guns in the United States or anywhere else in the world. I am a US citizen and voter and I oppose a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. I object to this rule change and transfer of authority. Please do not implement it. Thank you

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:31 AM
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<b>Tracking No.</b> 1k2-943z-g5d4
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1364

Public Comment 1426. Individual. John Sanders. 7-5-18

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## Submitter Information

**Name:** john sanders

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## General Comment

I am in opposition to any change in the sales and deportation of firearms listed as category I,II, or III, Doing so may, no, will endanger the security of the nation. Running arms to terroist and drug gangs is limited now but would only escalate arming these thugs under Commerce Dept rules. Again I am in opposition to this change



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:30 AM
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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1363

Public Comment 1427. Individual. Edna Montague. 7-5-18

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## Submitter Information

**Name:** Edna Montague

**Address:**

P.O. Box 6534  
OCEAN VIEW, 96737

**Email:** ednamontague@gmail.com

**Phone:** 8089297208

**Fax:** 96737

---

## General Comment

The sale of fire arms and weapons should stay under the State Department to ensure that weapons do not get into the hands of terrorist or enemies of this counrty. The State Department has been doing a good job of monitoring the sales so they can be stopped before it is to late. The Commerce Department does not have the personnel or experience to monitor the sales of weapons. This change will seriously jeopardize our national security . I ask that there be no rule change regarding the sales of weapons.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:29 AM
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<b>Posted:</b> July 17, 2018
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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1362

Public Comment 1428. Anonymous. 7-5-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Don't allow semi-automatic weapons to be exported. It could put them into the hands of our enemies or people with mental health problems, putting many innocent people in danger.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:28 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9440-1p5h
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1361

Public Comment 1429. Individual. Susan Herting. 7-5-18

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## Submitter Information

**Name:** Susan Herting

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## General Comment

I do oppose the new rule change that would switch the regulations of firearms export sales from the U.S. State Department to the U.S. Commerce Department. That only provide less hurdles for firearms traffickers, organized crime and other violent agents. Thank you

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:27 AM
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**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1360

Public Comment 1430. Individual. Bruce Beese. 7-5-18

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## Submitter Information

**Name:** Bruce Beese

**Address:**

1172 Portland Ave  
St. Paul, MN, 55104

**Email:** bandmbeese@msn.com

**Phone:** 651-659-0379

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## General Comment

I am against the movement of oversight of firearms exports from the State Department to the Commerce Department.

Please do not make this change. Firearms regulations are just fine under State.

Thank you,

Bruce Beese

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:26 AM
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<b>Status:</b> Posted
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<b>Tracking No.</b> 1k2-9440-ii6c
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1359

Public Comment 1431. Individual. Marjory Keenan. 7-5-18

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## Submitter Information

**Name:** Marjory Keenan

**Address:**

1816 Vine Street  
Berkeley, CA, 94703

**Email:** marjkeen44@gmail.com

**Phone:** 5105252649

**Fax:** 94703

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## General Comment

I oppose the proposed rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Insure our safety by not changing this rule.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:20 AM
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9440-42ht
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1358

Public Comment 1432. Individual. Joy Hamby. 7-5-18

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## Submitter Information

**Name:** Joy Hamby

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## General Comment

I believe the regulation of firearms should remain under the US Dept of State because the Congress needs to have veto power.

Checks and balances are always necessary to protect our government and country and taxpayer's money.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:22 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9442-3spb
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1357

Public Comment 1433. Individual. David Lemon. 7-5-18

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## Submitter Information

**Name:** David Lemon

**Address:**

2744 Eleki Pl

Lihue, HI, 96766-9605

**Email:** typenerd@mindspring.com

**Phone:** 4086743341

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## General Comment

Moving regulation of firearms export from the Department of State to the Department of Commerce seems like a misguided idea, and is likely to decrease our country's security. Without treating firearms as a military export, the risks of accidentally enabling terrorists and arms traffickers are simply too high.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:23 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9442-aoym
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1356

Public Comment 1434. Individual. Anna Gladstone. 7-5-18

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## Submitter Information

**Name:** Anna Gladstone

**Address:**

542 W Grand Blvd

Detroit, MI, 48216

**Email:** aceduceanna@gmail.com

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## General Comment

The proposed rule to loosen regulations on firearm exportation is terrifying. Why would we want to arm the rest of the world? So that they can attack? So that they can build militias and guerilla warfare? So that these guns can end up in the hands of terrorist groups? Stop arming terrorists! Dont implement this change, it is too dangerous for our country and the world.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:23 AM
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9442-8bh0
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1355

Public Comment 1435. Individual. Chad Reddick. 7-5-18

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## Submitter Information

**Name:** Chad Reddick

**Address:**

50 Cherry Lane

Durham, CT, 06422

**Email:** reddick.chad@gmail.com

**Phone:** 8603491768

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## General Comment

I am deeply concerned with the proposed plan to switch regulation of firearms exports from the State Department to the Commerce Department. Anything that can make it easier to sell more guns overseas compromises United States security. Please take whatever steps are necessary to tightly regulate overseas firearms sales in order to keep people in America, and around the world, safer.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:16 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9443-df96
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1354

Public Comment 1436. Individual. B Dudney MD. 7-5-18

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## Submitter Information

**Name:** B Dudney, MD

**Address:**

Forestville, CA, 95436-9604

**Email:** kosmicdollop@saber.net

**Phone:** +11234567890

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## General Comment

Opposed to shifting regulation of firearms export to U.S. Commerce Department.

Would stop Congress being automatically informed of weapons sales it could stop in the name of national security, especially to countries with serious human rights abuses, such as the Philippines and Turkey.

Commerce Department lacks resources to enforce export controls: Bureau of Industry and Security does not have staff everywhere. Hence, firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

It would eliminate:

..the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

..licensing requirements for brokers, increasing the risk of trafficking.

..State Departments block on 3D printing of firearms.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:15 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9443-24dt
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1353

Public Comment 1437. Individual. Warren Wilkins. 7-5-18

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## Submitter Information

**Name:** Warren Wilkins

**Address:**

Seattle, WA, 98118

**Email:** concerned-voter@wwxyz.com

**Phone:** 2067257100

**Organization:** Warren Wilkins Designer

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## General Comment

Gun money is blood money. I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 8:14 AM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9443-szd5
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1352

Public Comment 1438. Individual. Ivan Rhudick. 7-6-18

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## Submitter Information

**Name:** Ivan Rhudick

**Address:**

251 5th Avenue

San Francisco, 94118

**Email:** ivan.rhudick@gmail.com

**Phone:** 510-414-4500

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Congress should continue to monitor the sales of large amounts of weapons to other nations in the interest of national security.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 11:01 PM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-9443-3xau
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1351

Public Comment 1439. Individual. Linda Massey. 7-6-18

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## Submitter Information

**Name:** Linda Massey

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This is a dangerous and irresponsible action that must be stopped. The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They have been pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally with serious implications for our national security.

Firearms exports are classified as military under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With having firearms sales regulated by the U.S. Commerce Department, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns.

The reality is - this is not only dangerous for other countries, but our country as well. This is truly an insane proposition that would turn ugly and deadly fast. The NRA has already proven that they don't care about anyone's life and that they will go to great lengths to get what they want. This must be stopped because they don't care how many people will die in other countries or this one as long as they make their billions. They just don't care.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 11:00 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-9444-yk0p
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1350

Public Comment 1440. Individual. Rosalind Bresnahan. 7-6-18

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## Submitter Information

**Name:** Rosalind Bresnahan

**Address:**

500 Edgerton Dr.

San Bernardino, CA, 92405

**Email:** rosalind568@gmail.com

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## General Comment

I strongly oppose the rule change that would transfer the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Arms are not just another US export to promote and arms sales should be subject to review for non-commercial implications such as use in human rights violations. These are foreign policy issues and should be treated accordingly.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:59 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-9444-9o2u
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1349

Public Comment 1441. Individual. Derek Benedict. 7-6-18

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## Submitter Information

**Name:** Derek Benedict

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## General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We truly do NOT need to export more weapons of death around this planet.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:58 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-9445-dtcl
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1348

Public Comment 1442. Individual. Robert Sanford. 7-6-18

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## Submitter Information

**Name:** Robert Sanford

**Address:**

Camas, WA, 98607

**Email:** rhsanford@gmail.com

**Phone:** 2537223694

**Organization:** Northwest Freethought Alliance

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## General Comment

I'm a retired police officer and academy instructor.

I could hardly oppose this end-run around decency more strongly.

There are more guns in the US than almost anywhere.

Why do the gun manufacturers want to spread the cancer of gun violence around the world?

Could it be for money?

Unconscionable.

But not no surprise.

Robert Sanford

Camas, WA



# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:56 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-9445-aslp
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1347

Public Comment 1443. Anonymous, 7-6-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

For Gods sake, do NOT allow the switching of the regulation of firearms exports from the State Department to the Commerce Department!

Without question, it would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel the violence that destabilizes countries and causes mass migration.

Although Putin would like the way it would further undermine the reputation of standing for world peace that the USA has nurtured since its foundation, even he wouldnt approve of this if it meant his citizens could buy the guns.

Please, please do not let the NRA get away with this dangerous, greedy, thoughtless move. Keep gun control and the control of export licenses of semiautomatic assault weapons and other powerful firearms within the State Department!!

Our national security and, to a large extent, that of the world, depends upon it!

I would ordinarily leave my contact info but I'm afraid of NRA repercussions.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:53 PM
<b>Received:</b> July 06, 2018
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<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-9445-t3ll
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1346

Public Comment 1444. Individual. Charlene Kahn. 7-6-18

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## Submitter Information

**Name:** Charlene Kahn

**Address:**

2308 48TH AVE SW

SEATTLE, 98116

**Email:** charlenefk@gmail.com

**Phone:** 2062958396

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The U.S. State Department is focused on safeguarding our nation. The U.S. Commerce Department is focused on promoting American business. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:52 PM
<b>Received:</b> July 06, 2018
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<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-9447-qd5p
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1345

Public Comment 1445. Individual. Violet Young. 7-6-18

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## Submitter Information

**Name:** Violet Young

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## General Comment

I think this is a terrible idea and should not be allowed to go forward.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:51 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944a-9yfn
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1344

Public Comment 1446. Individual. Sheila Stone. 7-6-18

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## Submitter Information

**Name:** Sheila Stone

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Firearms are dangerous and there needs to be more control, not less, to prevent acts of organized crime, political violence, terrorism, and human rights violations around the world.

I strongly oppose this rule that would make the world a more dangerous place.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:50 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944c-24by
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1343

Public Comment 1447. Individual. Em W. 7-6-18

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## Submitter Information

**Name:** Em W

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## General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Therefore, I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:49 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944c-dum9
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1342

Public Comment 1448. Individual. L.J. Coburn. 7-6-18

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## Submitter Information

**Name:** L.J. Coburn

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## General Comment

I oppose the proposed move of firearm exports from the State Department. For our and everyone's safety, we must not help arm the world further. Bad actors are a fact of life and they will ensure greater numbers of efficient killing devices will go to those intent on killing Americans, as well as their fellow citizens and others, thus supporting actions against our personal and national interest.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:48 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
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<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1341

Public Comment 1449. Individual. Mary Jo DuRivage. 7-6-18

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## Submitter Information

**Name:** Mary Jo DuRivage

**Address:**

21540 Morley Ave.  
Dearborn, MI, 48124

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## General Comment

I oppose the proposed rule to transfer oversight on small arms (firearms) exports from the State Dept. to the Commerce Dept. Commerce means business. These weapons should continue to be regulated by the State Dept. We are not talking about normal household goods. I also oppose the elimination of Congressional oversight of commercial weapons sales of 1 million dollars or more.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:47 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944d-bu41
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1340

Public Comment 1450. Individual. Mary H. 7-6-18

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## Submitter Information

**Name:** Mary H

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## General Comment

If we're serious about terrorism, we need to keep the regulation of firearms export licenses in the State Department. I have the unique vantage point of being a New Yorker who lived through 9-11 and as someone whose hometown has had two school shootings, so I take this issue seriously and I'm concerned that the Department of Commerce will have more lax enforcement than the State Department.

Thanks!

Mary



# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:45 PM
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<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944d-x896
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1339

Public Comment 1451. Anonymous. 7-6-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I usually try to avoid using comments that are written for masses because I worry they won't be taken seriously. I am disappointed that just about anybody in the United States can legally buy a gun that can kill multiple civilians or LEO in a matter of minutes. The idea that a rule is being considered to spread this irresponsible behavior to other countries over which we have no control and no ability to change laws is appalling. I am attaching a letter that I think should be taken very seriously because I agree with it and want to keep the world safer even as our own country goes up in flames: I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one else asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:44 PM
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<b>Tracking No.</b> 1k2-944e-6ior
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1338

Public Comment 1452. Individual. Susan Lasswell. 7-6-18

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## Submitter Information

**Name:** Susan Lasswell

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## General Comment

This move raises the threat of gun violence and danger in the US and across the world.

Without State Department oversight and regulatory authority, firearms will be exported to anyone with money and fuel increased organized crime and terrorism. The children and innocents of the world will suffer while gun lobbyists, manufacturers and the NRA will profit. I strongly oppose this unnecessary change and ask you to not approve it. Thank you.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:42 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944e-fzz5
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1337

Public Comment 1453. Individual. Concerned Citizen. 7-6-18

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## Submitter Information

**Name:** Concerned Citizen

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## General Comment

I am strongly opposed to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security and eliminate congressional oversight of commercial weapons sales of \$1 million or more. This rule has one purpose only: to garner profits for a U.S. gun industry at the expense of safety for communities abroad and, potentially, our own armed service members. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one else asked for it or wanted it. One can see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for civilian use; they were designed to kill on the battlefield. Please do not move forward with this disastrous policy that eliminates reasonable oversight that balances commerce with international diplomacy and national security.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:41 PM
<b>Received:</b> July 06, 2018
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<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944e-5trx
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1336

Public Comment 1454. Individual. Julia Cechvala. 7-6-18

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## Submitter Information

**Name:** Julia Cechvala

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## General Comment

As a mother and citizen I am alarmed at the amount of gun violence in this nation and at the complete failure of the government to prevent it. It's past time to stand up to the NRA and protect our children. I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:39 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944e-ow5a
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1335

Public Comment 1455. Individual. Aaron Karp. 7-6-18

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## Submitter Information

**Name:** Aaron Karp

**Address:**

BAL 7006

Old Dominion University

Norfolk, VA, 23529

**Email:** akarp@odu.edu

**Phone:** 17576835700

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## General Comment

The proposed ITAR revision for firearms and ammunition promises little, and risks much. As an analyst of the global arms trade and weapons proliferation for thirty years, I recognize the transformative power of regulatory reform. But this is something else. The proposed revisions promise short-term benefits, which seem unlikely to amount to much in an already competitive global market. That makes this deregulation for the sake of deregulation itself. Meanwhile, the change unleashes forces certain to accelerate long turn American industrial decline and loss of influence over global consequences.

First, they show that the United States no longer will set global normative standards for all form of arms transfers and non-proliferation. Previously the United States Government has shown it will not further tighten restrictions. As the first outright relaxation of oversight standards in arms exports in over fifty years, the change marks a switch in policy dating from the Kennedy Administration.

Second, as the dominant player in global small arms trade, the United States has the most to lose from further loosening. As other countries emulate Americas relaxation of restrictions, not only will there be more firearms reaching more hotspots, but we can be certain the United States will see its share of a more competitive market decline. Other manufacturing countries, with lower wages and more aggressive export subsidies, are more likely to reap the seeds sown here.

Third, the change marks a fundamental shift in the nature of arms export oversight. By reducing the role of the

US Government, it leaves regulation exclusively to the recipient government. This shifts the burden of proof in international human rights and state oppression, from outside powers with no direct interest in the outcome, to the recipient governments, governments that are often guilty of using imported weapons in appalling or frightful ways, ways that would be completely illegal in the United States.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:38 PM
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<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944e-p2i3
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1334

Public Comment 1456. Individual. Stair Calhoun. 7-6-18

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## Submitter Information

**Name:** Stair Calhoun

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## General Comment

I strongly oppose a rule change switching the regulation of firearms exports from the U.S. Department of State to the U.S. Department of Commerce. This would adversely affect our national security and would destabilize countries around the globe

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:37 PM
<b>Received:</b> July 06, 2018
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<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944f-o156
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1333

Public Comment 1457. Individual. Patricia Sammann. 7-6-18

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## Submitter Information

**Name:** Patricia Sammann

**Address:**

404 E. George Huff Drive  
Urbana, IL, 61801

**Email:** new2pat\_s@comcast.net

**Phone:** 2173442114

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## General Comment

I oppose changing the regulation of firearms export from the U.S. State Department to the U.S. Commerce Department. This would remove these exports from the oversight of Congress and would threaten our national security. It would facilitate exports to oppressive regimes, remove safeguards that prevent organized crime and terrorists from obtaining weapons, and fuel destabilizing violence around the world. Do NOT make this unnecessary change, which will put America at grave risk.



# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:35 PM
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<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944f-2p3o
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1332

Public Comment 1458. Individual. Rosemary Gordon. 7-6-18

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## Submitter Information

**Name:** Rosemary Gordon

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It would promote the sale of more guns in the world, thereby making the world less safe for all.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:34 PM
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<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944f-z955
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1331

Public Comment 1459. Individual. Sue Mancino. 7-6-18

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## Submitter Information

**Name:** Sue Mancino

**Address:**

OH,

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## General Comment

As a former Vietnam Era military spouse I oppose anything which endangers our troops.

Therefore I oppose switching the regulation of firearms export from the U.S. State Department to the Commerce Department.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:33 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944g-ylij
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1330

Public Comment 1460. Anonymous. 7-6-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

We need more gun regulation not less, I oppose this rule change.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:32 PM
<b>Received:</b> July 06, 2018
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<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1329

Public Comment 1461. Individual. Don Hayler. 7-6-18

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## Submitter Information

**Name:** Don Hayler

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## General Comment

I oppose shifting the responsibility for gun exports from the State Department to the Commerce Department. As we've seen in recent years, armed groups around the world can cause global instability that can affect American safety. The State Department is in the best position to ensure that firearm exports do not exacerbate military situations or humanitarian crises. Thank you.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:31 PM
<b>Received:</b> July 06, 2018
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<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944g-bjq6
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1328

Public Comment 1462. Individual. T. Katz. 7-6-18

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## Submitter Information

**Name:** T. Katz

**Address:**

274 Pine St.

Deerfield, IL, 60015

**Email:** katz.t@nb27.org

**Phone:** 8472361006

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The sale of more guns is not the answer, not the solution.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:29 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
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<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1327

Public Comment 1463. Individual. Harvey Liszt. 7-6-18

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## Submitter Information

**Name:** Harvey Liszt

**Address:**

1922 Greenbrier Drive  
CHARLOTTESVILLE, VA, 22901-2915

**Email:** hliszt@nrao.edu

**Phone:** 4342276356

**Organization:** National Radio Astronomy Observatory

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## General Comment

I oppose the proposed rule that allows the freer export of dangerous arms.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:28 PM
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<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944g-jjio
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1326

Public Comment 1464. Individual. Mary O'Neill. 7-6-18

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## Submitter Information

**Name:** Mary O'Neill

**Address:**

6400 Gilmet Drive

Presque Isle, MI, 49777

**Email:** moneill16@excite.com

**Phone:** 9895952448

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## General Comment

We do not need more guns out there...there are already too many as shown by the number of people killed daily!

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:26 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944g-r09r
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1325

Public Comment 1465. Individual. Suzanne Abrams. 7-6-18

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## Submitter Information

**Name:** Suzanne Abrams

**Address:**

5688 N. 6th St.

Fresno, CA, 93710

**Email:** sabrams7337@gmail.com

**Phone:** (559) 435-0612

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## General Comment

PLEASE of not allow guns to proliferate! PLEASE do not allow guns to proliferate!



# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:24 PM
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<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944h-7pyd
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1324

Public Comment 1466. Anonymous. 7-6-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

The proposed rule is, put bluntly, a disastrous mistake that would cause the Bureau to exceed its statutory authority and intrude on matters beyond the purview of the Department.

The international export of arms and ammunition is a matter of foreign policy and international relations. U.S. sales of weapons and other ordnance abroad directly impact our relationships with other nations and our own national security. The question of whether such exports would arm our enemies and/or antagonize our allies is not a commercial one, nor is it one that should be left to the discretion of arms manufacturers and their lobbyists. It is therefore well beyond the realm of the Department of Commerce and belongs where it presently lies, with the Department of State.

Arms manufacturers would be the sole beneficiaries of the proposed rule, which would present significant risks to U.S. national interests and the public welfare. The proposed rule should therefore be abandoned.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:22 PM
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<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
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<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1323

Public Comment 1467. Individual. Lynn Winston 7-6-18

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## Submitter Information

**Name:** Lynn Winston

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## General Comment

I strongly oppose the proposed rule and urge you to abandon the proposal that will make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:21 PM
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<b>Tracking No.</b> 1k2-944h-iuiy
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1322

Public Comment 1468. Individual. Todd Thurwachter. 7-6-18

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## Submitter Information

**Name:** Todd Thurwachter

**Address:**

2437 Villanova Drive

Vienna, VA, 22180

**Email:** toddthurwachter@hotmail.com

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## General Comment

As a 25-year veteran of the U.S. Commercial Service, charged with promoting the export of U.S. products & services, I strongly PROTEST against this change in the approval of the export of U.S. munitions.

from  
It is absolutely critical the the U.S. Department of State retain this authority, in order to balance the financial gain from export sales against our other important foreign policy concerns, such as a country's treatment of its own citizens, its commitment to human rights, rule of law, and basic, fundamental democratic principles.

Any short-term gain in export sales is not worth the wholesale abrogation of the very principles which America - the shining city on the hill and the world's beacon of democracy -- represents to the world and for which Americans have died.

Todd Thurwachter

Foreign Commercial Service Officer, U.S. Foreign & Commercial Service, Department of Commerce (1984-2008)

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:20 PM
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<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944h-jonh
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1321

Public Comment 1469. Anonymous. 7-6-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose any rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Please find something else to do with your busy day.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:19 PM
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<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944h-fkv5
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1320

Public Comment 1470. Individual. Martha Sammartano. 7-6-18

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## Submitter Information

**Name:** Martha Sammartano

**Address:**

CO, 803014123

**Email:** sammartanomr@gmail.com

**Phone:** 3035169833

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## General Comment

I am writing in opposition to the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Currently, firearms exports are classified as military. For this reason, they are under the regulation of the State Department, and Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns.

The Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

This rule change would have the following negative consequences:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of

pre-license and post-shipment inspections and publicly reports on them.

2. It would remove licensing requirements for brokers, increasing the risk of trafficking.

3. It would remove the State Departments block on the 3D printing of firearms.

Firearms are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:17 PM
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<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1319

Public Comment 1471. Anonymous. 7-6-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I OPPOSE any legislation that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. In addition, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. DO NOT ALLOW THIS TO HAPPEN.

# PUBLIC SUBMISSION

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<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1318

Public Comment 1472. Anonymous. 7-6-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

SDEMI-AUTOMATIC RIFLES ARE MILITARY AND SHOULD NEVER BE EXPORTED NO MATTER WHAT THE NRA SAYS



# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:14 PM
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<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1317

Public Comment 1473. Individual. Malcolm Kenton. 7-6-18

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## Submitter Information

**Name:** Malcolm Kenton

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## General Comment

I write to express strong opposition to a proposed rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. This rule change would endanger our national security and set a dangerous precedent.

This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would also remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

I look forward to seeing this proposed change scrapped.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:13 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944h-5d68
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1316

Public Comment 1474. Individual. Cynthia Tuthill. 7-6-18

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## Submitter Information

**Name:** Cynthia Tuthill

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:12 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944h-x4km
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1315

Public Comment 1475. Individual. Nancy Bekavac. 7-6-18

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## Submitter Information

**Name:** Nancy Bekavac

**Address:**

2737 Devonshire Pl. NW

Apt. 218

Washington, DC, 20008

**Email:** nancy.bekavac@gmail.com

**Phone:** 202 450 1547

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## General Comment

I am writing to OPPOSE the transfer of authority over arms exports to the Department of Commerce from the State Department. As a resident of the District of Columbia, I have no voting representative in the Congress, so I am making my voice heard directly, here and now.

Firearms are the instrumentalities of war: war is evil, and the best way to avoid it is to undertake to understand and combat the sources of war. Treating the export of firearms as a mere form of commerce is shortsighted, stupid and vile. The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

I have seen war in Vietnam as a journalist; I have tried to combat its aftereffects in the Balkans. Particularly in the latter, control of arms would have limited, to some extent, the predations on the civilian populations. I am utterly opposed to this change: keep firearms export controls in the hands of diplomats, not salesmen.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 10:10 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944i-axjh
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1314

Public Comment 1476. Individual. Bonnie Jaskolka. 7-6-18

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## Submitter Information

**Name:** Bonnie Jaskolka

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## General Comment

Assault weapons and other powerful war toys have no place in public hands.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:51 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944i-o02y
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1270

Public Comment 1477. Individual. Ann Anonymous. 7-6-18

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## Submitter Information

**Name:** Ann Anonymous

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## General Comment

The NRA is proving that it is an International Terrorist Organization. Do not leave it up to other Nations to curb these munition sales.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:50 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944i-w7jt
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1269

Public Comment 1478. Individual. Brittany Olsen. 7-6-18

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## Submitter Information

**Name:** Brittany Olsen

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Maintaining national security and individual safety not just here but in all countries of the world is more important than making money off of violence.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:49 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944i-672p
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1268

Public Comment 1479. Individual. Michelle Geiger. 7-6-18

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## Submitter Information

**Name:** Michelle Geiger

**Address:**

7245 N Bergen Rd  
Bergen, NY, 14416

**Email:** geiger3778@gmail.com

**Phone:** 5857973795

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We do not need easier access to firearms.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:48 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944i-h0q8
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1267

Public Comment 1480. Individual. Kathleen Sewright. 7-6-18

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## Submitter Information

**Name:** Kathleen Sewright

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## General Comment

More guns in this country will NOT make us safer.



# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:43 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944i-5yax
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1266

Public Comment 1481. Individual. George Bond. 7-6-18

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## Submitter Information

**Name:** George Bond

**Address:**

2417 Milan St  
New Orleans, LA, 70115

**Email:** gdbondii@cox.net

**Phone:** 5047025961

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## General Comment

We have far too many guns in this country. We dont need more.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:44 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944i-zt42
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1265

Public Comment 1482. Anonymous. 7-6-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Dangerous weapons absolutely need to be regulated.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:30 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944i-tce8
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1235

Public Comment 1483. Individual. Barb Evans. 7-6-18

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## Submitter Information

**Name:** Barb Evans

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## General Comment

I am demanding that you do NOT change current rules for regulation of firearm exports from US State Department to Commerce Department.

There are too many damn guns and military weapons in the world already - even the police are out-gunned!

Regulation of firearm exports needs to stay in the State Department - it should NOT be handled by the Commerce Department!

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:15 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944i-sn98
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1234

Public Comment 1484. Individual. Gunnar Madsen. 7-6-18

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## Submitter Information

**Name:** Gunnar Madsen

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## General Comment

Firearms are military, and their export and oversight should be governed by the State Department, which has the knowledge and expertise to know when and where exports are acceptable.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:14 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944i-yhso
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1232

Public Comment 1485. Individual. Elizabeth ODear. 7-6-18

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## Submitter Information

**Name:** Elizabeth ODear

**Address:** United States,

**Email:** ekodear@gmail.com

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## General Comment

The U.S. Commerce Department is focused on promoting American business not safeguarding our nation. This handling of export licenses belongs with the U.S. State Department to ensure that people who are not friendly to our country are not given Licenses.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:12 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944i-znll
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1228

Public Comment 1486. Individual. Jill Acree. 7-6-18

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## Submitter Information

**Name:** Jill Acree

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## General Comment

I am writing to oppose changing international gun sales to the Commerce Department. Keep international guns sales regulations with the State Department.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:10 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944i-bthh
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1226

Public Comment 1487. Individual. Mary Cato. 7-6-18

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## Submitter Information

**Name:** Mary Cato

**Address:**

Arlington, TX, 76012

**Email:** mary.e.cato@gmail.com

**Phone:** 8172990194

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## General Comment

I oppose the proposed rule. Control of firearms, buns, ammunition and related articles definitely warrant control under the USML, to provide some protection to the public.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:09 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944i-teqt
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1223

Public Comment 1488. Individual. David Joyner. 7-6-18

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## Submitter Information

**Name:** David Joyner

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## General Comment

The NRA is one of the most powerful and destructive entities in the US, and look at what it has done to this country. Please do not allow the NRA to expand its influence and destructiveness to the global scene by allowing their shift to the Dept. of Commerce.



# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:08 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944i-s568
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1221

Public Comment 1489. Individual. Pamela Joyner. 7-6-18

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## Submitter Information

**Name:** PAMELA JOYNER

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## General Comment

THE UNREGULATED FLOW OF ARMS, AS PROPOSED BY THE NRA (YES, IT IS!), IS INSANE...KINDLY DO YOUR JOB AND LET THE ARMS BE REGULATED BY THE STATE DEPT, NOT COMMERCE.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:05 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944i-qiy7
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1217

Public Comment 1490. Individual. William O'Brien. 7-6-18

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## Submitter Information

**Name:** William O'Brien

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## General Comment

I oppose this rule change that would switch the regulation of overseas firearm sales from the US State Dept to the US Commerce Dept.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:04 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944j-rylz
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1215

Public Comment 1491. Individual. Judi Poulson. 7-6-18

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## Submitter Information

**Name:** Judi Poulson

**Address:**

1881 Knollwood Drive

Fairmont, 56031

**Email:** judpeace@gmail.com

**Phone:** 5072355288

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## General Comment

Stop the floodgates for new gun sales. Thanks

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:03 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944j-ypvr
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1213

Public Comment 1492. Individual. Dorothy Glew. 7-6-18

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## Submitter Information

**Name:** Dorothy Glew

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## General Comment

We badly need tighter gun control laws. How many more people need to be shot to death before we do something??????

I ache for the relatives of people (many of them children) who have lost their lives because of the accessibility of guns.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:02 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944j-ty2b
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1211

Public Comment 1493. Individual. Reese Forbes.7-6-18

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## Submitter Information

**Name:** Reese Forbes

**Address:**

4225 West Pine Blvd #14

Saint Louis, 63108-2869

**Email:** wiselion@att.net

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## General Comment

I am an Army Veterans and I definately know we strict controll of guns and all other types of firearms.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:01 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944j-tl1k
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1210

Public Comment 1494. Individual. Gail Craig. 7-6-18

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## Submitter Information

**Name:** Gail Craig

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## General Comment

I vehemently oppose this rule change to switch the regulation of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:00 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944j-y381
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1209

Public Comment 1495. Individual. Nina Riddel. 7-6-18

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## Submitter Information

**Name:** Nina Riddel

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## General Comment

Stop making it easier for domestic abusers and mentally ill people to harm & kill!

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 2:59 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944j-vqdz
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1208

Public Comment 1496. Individual. Barbara Francisco. 7-6-18

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## Submitter Information

**Name:** Barbara Francisco

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## General Comment

I am writing to oppose this rule change. I oppose switching the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

I am concerned that the Commerce Department does not have the resources to adequately enforce export controls.



# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 2:57 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
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<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1207

Public Comment 1497. Anonymous. 7-6-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

The easy availability and rampant proliferation of guns, guns, guns in our society are insane and need to be stopped with sensible regulation, not with the rollback of regulations.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 2:56 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944j-hd3d
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1206

Public Comment 1498. Individual. Paul Petruccelli. 7-6-18

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## Submitter Information

**Name:** Paul Petruccelli

**Address:**

Coram, NY, 11727

**Email:** ppetrucc@optonline.net

**Phone:** 5555555555

**Organization:** Cablevision

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## General Comment

Have you actually READ the Second Amendment?

Having trouble decoding a clear COMPOUND SENTENCE?

Have you read up on the historical realities that prevailed when it was written?

Why not just transfer enforcement authority to the NRA and GET IT OVER WITH?

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 2:55 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944j-jxv5
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1205

Public Comment 1499. Individual. Frank Evelhoch II. 7-6-18

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## Submitter Information

**Name:** Frank Evelhoch, II

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## General Comment

First let me say that this is a totally crazy idea that's proposed. I personally like the fact that with the State Department in control of the the semi-automatic assault and other powerful weapons export licenses that Congress is always notified of sales of large numbers of these types of weapons to foreign countries and can override the sale if needed.

Here are 3 ways that I see this rule change as being harmful to the welfare of all US citizens:

- 1) It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- 2) It would remove licensing requirements for brokers, increasing the risk of trafficking.
- 3) It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

On top of all this the Commerce Department is prepared in any way to handle this licensing process the way the State Department does. The US should not be looking to see how it can sell the most military type weapons possible.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 2:53 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-944k-w158
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1204

Public Comment 1500. Individual. Mary Cato. 7-6-18

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## Submitter Information

**Name:** Mary Cato

**Address:**

Arlington, TX, 76012

**Email:** mary.e.cato@gmail.com

**Phone:** 8172990194

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## General Comment

I oppose the proposed rule for the State Department to relinquish control of firearms, guns, ammunition & related articles to the Department of Commerce. On May 24, the Trump administration proposed to make it easier to export U.S. guns and ammunition globally, even though U.S.- exported firearms are already used in many crimes, attacks and human rights violations in many other nations. Action under the rule if it is enacted will endanger lives merely to enrich munitions dealers. The Trump administration proposal applies to assault weapons and other powerful firearms, moving export licenses from the State Department to the Commerce Department. The U.S. gun lobby has advocated for these policies. The Department of Commerce estimates that the transfer of authority will increase the number of export applicants by 10,000 annually, but the Commerce Department does not have the resources to enforce export controls, even now.

The proposed rule change:

- 1.Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- 2.Eliminates Congressional oversight for important gun export deals.
- 3.Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- 4.Removes statutory license requirements for brokers, increasing risk of trafficking.
- 5.Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- 6.Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

7.Reduces transparency and reporting on gun exports.

8.Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 6:02 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9437-veve
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1708

Public Comment 1501. Individual. Hattie Gerrish. 7-6-18

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## Submitter Information

**Name:** Hattie Gerrish

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## General Comment

I am opposed to these anti-security rule changes.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 6:05 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9437-6o7k
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1709

Public Comment 1502. Individual. Phoebe Farag. 7-4-18

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## Submitter Information

**Name:** Phoebe Farag

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## General Comment

I am against switching the regulation of firearms exports from the State Department to the Commerce Department. A switch like this would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The export of firearms should be done by experts in diplomacy, not experts in business. The United States is already a huge exporter of arms to the world, and changing this rule would make the world even MORE dangerous than it is:

1- It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

2- It would remove licensing requirements for brokers, increasing the risk of trafficking.

3- It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 6:06 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9437-trwa
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1710

Public Comment 1503. Individual. Richard Crooker. 7-4-18

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## Submitter Information

**Name:** Richard Crooker

**Address:**

7928 Woodsbluff Run  
Fogelsville, PA, 18051

**Email:** rcrooker@ptd.net

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## General Comment

The sale of weapons to other countries (or entities therein) should be in a manner which respects said country's laws. It should be done in a manner which supports, not aggravates, our foreign policy, and therefore oversight belongs with the State Dept.

To shift this responsibility to the Commerce Dept. is to put business first; it makes the U.S. no better than gun runners.

The last thing we need is to export our problems (e.g., assault weapons for individuals, large magazines) to other countries, and make it harder to work diplomatically with them.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 6:06 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9436-hwy1
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1711

Public Comment 1504. Individual. Andrew Kistler. 7-4-18

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## Submitter Information

**Name:** Andrew Kistler

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This idea is dangerous and irresponsible.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 6:07 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9436-jl4m
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1712

Public Comment 1505. Individual. Daniel Giesy. 7-4-18

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## Submitter Information

**Name:** Daniel Giesy

**Address:**

4706 Chestnut Fork Road

Gloucester, VA, 23061

**Email:** dpgiesy@netscape.net

**Phone:** 8048242829

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

In particular, the interests of the citizens of the United States are better served by the status quo than by the proposed change.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 6:08 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9436-eljq
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1713

Public Comment 1506. Individual. Valerie Klauscher. 7-4-18

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## Submitter Information

**Name:** Valerie Klauscher

**Address:**

623 Prospect Street

Crescent Township, PA, 15046

**Email:** klauschers@verizon.net

**Phone:** 7244577412

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## General Comment

I am adamantly opposed to allowing export licenses of semiautomatic assault weapons and other powerful firearms to be overseen by the U.S. Commerce Department rather than the U.S. State Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

I also demand that you vet all comments that are posted on both the DOS and BIS sites for bot traffic. I am an actual citizen of the Commonwealth of Pennsylvania, USA.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 6:09 PM
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<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9436-n2gh
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1714

Public Comment 1507. Individual. Ann Gillespie. 7-4-18

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## Submitter Information

**Name:** Ann Gillespie

**Address:**

239 Virginia Ave

Audubon, 08106

**Email:** jakgillespie@gmail.com

**Phone:** 8569793016

**Fax:** 08106

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## General Comment

This is a dangerous game you are playing if this goes through. This is just a ploy to increase arms profits for gun manufacturers at the expense of common sense. This rule change will decrease oversight and control. Please reconsider.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 10:32 PM
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9436-knn1
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1715

Public Comment 1508. Individual. Patricia Keefe. 7-4-18

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## Submitter Information

**Name:** Patricia Keefe

**Address:**

1001 14th St. NW

Rochester, 55901

**Email:** patricia.keefe@rochesterfranciscan.org

**Phone:** 5072827441

**Fax:** 55901

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## General Comment

Violence (from weapons) begets violence. The U.S. sells huge amounts of weaponry to areas where death and destruction follow. There are organizations (Nonviolent Peaceforce) prepared to solve conflicts without weapons. Nonviolent solutions would work but the sale of weapons prevents solutions in increase death and destruction and long term conflict.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 10:34 PM
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<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9436-wlrf
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1716

Public Comment 1509. Individual. Jason Magidson. 7-4-18

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## Submitter Information

**Name:** Jason Magidson

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## General Comment

I oppose the proposed gun exports rule change for the following reasons:

It treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

It eliminates Congressional oversight for important gun export deals.

It transfers the cost of processing licenses from gun manufacturers to taxpayers.

It removes statutory license requirements for brokers, increasing risk of trafficking.

It reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

It enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

It reduces transparency and reporting on gun exports.

It transfers gun export licensing from agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political

violence, terrorism, and human rights violations. They should be subject to more controls, not less.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 10:35 PM
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9436-st6w
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1717

Public Comment 1510. Individual. Anne Dugaw. 7-4-18

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## Submitter Information

**Name:** Anne Dugaw

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## General Comment

I am strongly opposed to switching the regulation of firearms exports from the State Department to the Commerce Department. This would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. It is shameful that this switch is even being considered.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 10:36 PM
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<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9436-b3qq
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1718

Public Comment 1511. Individual. Bonnie Gorman. 7-4-18

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## Submitter Information

**Name:** Bonnie Gorman

**Address:**

222 Rock Island Rd  
Quincy, MA, 02169

**Email:** bonniegorman1@yahoo.com

**Phone:** 6144724498

**Fax:** 02169

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## General Comment

gun manufacturers are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Please OPPOSE this transfer on grounds of national security.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 10:37 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9436-fzdr
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1719

Public Comment 1512. Individual. Katie Barnett. 7-4-18

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## Submitter Information

**Name:** Katie Barnett

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## General Comment

I oppose the proposed rule: Control of Firearms, Guns, and Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML).

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[1]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[2]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[3]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[4]

[1] American Guns Drive the Migrant Crisis That Trump Wants to Fix With a Wall, The Trace, May 25, 2017.

[2] The Trump administration proposes making gun exports easier. Heres how to submit your public comment on this dangerous proposal, Violence Policy Center.

[3] Ibid., Violence Policy Center.

[4] "U.S. requires group to remove 3-D gun instructions from its website," CNN.com, May 13, 2013.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 10:39 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9436-oqrf
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1720

Public Comment 1513. Individual. Suzanne Byron. 7-4-18

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## Submitter Information

**Name:** Suzanne Byron

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## General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you for taking action to help make our country and our world a safer place.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 10:41 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9436-m2zz
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1721

Public Comment 1514. Individual. Marilyn Britton. 7-4-18

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## Submitter Information

**Name:** Marilyn Britton

**Address:**

16 Long Hill Estates  
Peterborough, NH, 03458

**Email:** mbrittons@comcast.net

**Phone:** 6039246898

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## General Comment

I VERY STRONGLY oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. As firearms exports are classified as "military" and therefore are under the regulation of the State Department, Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. And if weapons were shipped to these countries, they could be sold to our enemies.

It is my understanding that the Commerce Department does not have the resources to adequately enforce export controls and the Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

In the name of safety for EVERYONE, this rule change is a very dangerous one and should NOT happen.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 10:42 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9436-ump5
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1722

Public Comment 1515. Individual. Mary T. 7-4-18

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## Submitter Information

**Name:** Mary T

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## General Comment

I strongly oppose switching the regulation of firearms exports from the State Department to the Commerce Department. The Commerce Department is not equipped to do this work, is already understaffed as it is, and is carrying too much of a burden already with the mission-related work it has to do. This would a very irresponsible move that would haunt the U.S. down the road.

Removing this responsibility from the State Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Beware of the snake that will end up biting its own tail and eating itself alive.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 10:44 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9436-bf3t
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1723

Public Comment 1516. Individual. Amy Jones. 7-4-18

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## Submitter Information

**Name:** Amy Jones

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## General Comment

Please don't change firearms export regulations. America is already unsafe for the average citizen due to lax firearms regulations. Don't export the dangers of firearms to other countries. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 10:45 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9436-myc5
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1724

Public Comment 1517. Individual. Amy Assael. 7-4-18

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## Submitter Information

**Name:** AMY ASSAEL

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Why are we making it easier to spread gun violence??

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 10:47 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9436-8xrv
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1725

Public Comment 1518. Anonymous. 7-4-18

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S.

Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its

Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of

American guns and ammunition. It would eliminate the State Departments Blue Lantern program, in place since 1940,

which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove

licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the

3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print

weapons, the State Department successfully charged him with violating arms export laws, since his open-source

posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch

would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Thanking you for taking the appropriate action against this switch to make our country and our world a safer place.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 10:48 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9436-38kb
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1726

Public Comment 1519. Individual. Linda Szurley. 7-4-18

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## Submitter Information

**Name:** Linda Szurley

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## General Comment

Please keep classifying these gun sales as "military" or the NRA will send them all over the world, probably even to use them against ourselves. it is bad enough that guns can be bought by anyone here, what will happen when they are sold to anyone, anywhere, with no checks at all!!!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 10:51 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9436-pxll
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1727

Public Comment 1520. Momsrising.org. Anonymous. 7-4-18

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## Submitter Information

**Name:** Anonymous Anonymous

**Organization:** Mom'srising.org

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## General Comment

"I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Safeguarding our nation to putting it up for sale is UnAmerican. This new ruling transfers the authority from the US State Department whose focus is safeguarding our nation to the US Commerce Department whose focus is promoting business. Of course, the NRA and gun manufacturers want this as it will open new floodgates for arms sales internationally with serious implications for our national security. Thus democracy is sabotaged for both our country and we the people--all for the sake of fulfilling corporate and individualistic self interests.

The following are details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Kindly refrain from supporting this ruling as it will not serve the common good nor the values and culture that formed the United States of America.

Respectfully yours,

# PUBLIC SUBMISSION

<b>As of:</b> 7/18/18 9:53 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 18, 2018
<b>Tracking No.</b> 1k2-9435-un9m
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1738

Public Comment 1531. Individual. Kristina Cliff-Evans. 7-4-18

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## Submitter Information

**Name:** Kristina Cliff-Evans

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## General Comment

Do not agree to this horrendous plan by the NRA to increase the revenues of the gun manufacturers.

# PUBLIC SUBMISSION

<b>As of:</b> 7/18/18 9:55 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 18, 2018
<b>Tracking No.</b> 1k2-9435-x658
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1739

Public Comment 1532. Individual. Pamela couch. 7-4-18

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## Submitter Information

**Name:** Pamela couch

**Address:** United States,

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## General Comment

Come on. What are we going to do about all the gun violence.

# PUBLIC SUBMISSION

<b>As of:</b> 7/18/18 9:56 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 18, 2018
<b>Tracking No.</b> 1k2-9435-897q
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1740

Public Comment 1533. Individual. CAROL MARSH. 7-4-18

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## Submitter Information

**Name:** CAROL MARSH

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## General Comment

The proposed rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department is a horrific idea. Assault weapons have no purpose except to kill human beings, and if the United States starts selling guns around the world to anyone who has the money, the only possible effect would be a massive increase in violent death everywhere.



# PUBLIC SUBMISSION

<b>As of:</b> 7/18/18 9:56 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 18, 2018
<b>Tracking No.</b> 1k2-9435-t30y
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1741

Public Comment 1534. Individual. Philip Freidenreich. 7-4-18

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## Submitter Information

**Name:** Philip Freidenreich

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms exports should continue to be classified as military so that Congress can block sales of large batches of firearms to foreign countries, if it sees fit. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

<b>As of:</b> 7/18/18 9:57 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 18, 2018
<b>Tracking No.</b> 1k2-9435-pisd
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1742

Public Comment 1535. Individual. Marilyn Guterman. 7-4-18

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## Submitter Information

**Name:** Marilyn Guterman

**Address:**

Bowie, MD, 20715-1426

**Email:** mgute@hotmail.com

**Phone:** 3012625408

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## General Comment

The idea of moving the regulation of firearms from the state department to the commerce department is truly a bad idea. To cite just a few reasons it will make it easier for dictators, organized crime, and terrorists to obtain guns in large quantities. It would remove the state department block on the 3D printing of firearms which will only make matters worse. It will allow for the destabilization of countries with resulting unrest and deaths. Please, in the name of peace and sanity do not allow this to happen.

# PUBLIC SUBMISSION

<b>As of:</b> 7/18/18 9:58 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 18, 2018
<b>Tracking No.</b> 1k2-9435-g7g3
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1743

Public Comment 1536. Individual. Teresa Allen. 7-4-18

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## Submitter Information

**Name:** Teresa Allen

**Address:**

6184 North Fork Rd.  
Deming, WA, 98244

**Email:** allenterri@comcast.net

**Phone:** 3605924208

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The regulation of firearms should not be about maximizing profit but about the protection of U.S. citizens.

# PUBLIC SUBMISSION

<b>As of:</b> 7/18/18 9:58 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 18, 2018
<b>Tracking No.</b> 1k2-9435-7vxv
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1744

Public Comment 1537. Individual. D Jessop. 7-4-18

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## Submitter Information

**Name:** D Jessop

**Address:**

Santa Fe, NM, 87502

**Email:** darshanmay14@yahoo.com

**Phone:** 5057535013

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The purchase of guns should be a much more rigorous process with regular (i.e. yearly) mental evaluation and many other requirements. It's ridiculous that any person - sane or otherwise - can purchase a gun in our country.

# PUBLIC SUBMISSION

<b>As of:</b> 7/18/18 9:59 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 18, 2018
<b>Tracking No.</b> 1k2-9435-z4jz
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1745

Public Comment 1538. Individual. Mark Williams. 7-4-18

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## Submitter Information

**Name:** Mark Williams

**Address:**

2275 NE 9th Ave

Wilton Manors, FL, 33305

**Email:** markdavidw@gmail.com

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## General Comment

I oppose the rule change that would switch the regulations of firearms export -- including semiautomatic assault weapons and other powerful firearms -- from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open the floodgates for arms sales internationally, which will seriously undermine our national security when they flow back through our borders illegally and without background checks. The interests of the members of the gun lobby should never be more important than the safety of the American homeland.

# PUBLIC SUBMISSION

<b>As of:</b> 7/18/18 10:00 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 18, 2018
<b>Tracking No.</b> 1k2-9435-p8b8
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1746

Public Comment 1539. Individual. Juliette Blount. 7-4-18

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## Submitter Information

**Name:** Juliette Blount

**Address:** United States,

**Email:** juliegrant@earthlink.net

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. This is ridiculous and we need to stop pretending that our government is powerless to improve this situation. We know better. It is time to do better!

# PUBLIC SUBMISSION

<b>As of:</b> 7/19/18 8:28 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 19, 2018
<b>Tracking No.</b> 1k2-946n-p5uc
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1748

Public Comment 1540. Individual. Russell Paty. 7-9-18

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## Submitter Information

**Name:** Russell Paty

**Address:**

1409 Wren Ln

Beeville, TX, 78102

**Email:** rcpaty@msn.com

**Phone:** 361.542.9393

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## General Comment

I am Russell Paty and have traveled around the world three times. One of my sons stood at the DMZ in Korea and the other watched the border between Egypt and Israel. I am a voter and have been for years. I support the second amendment but this is not a constitutional issue.

This rule change will make it possible for violent gangs to purchase, made in the USA, firepower. It is possible, even likely, our failure to control sales weapons for the gangs to take over Mexico and threaten our southern border.

I oppose the proposed rule

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## Attachments

Weapon Export

I oppose the proposed rule for the following reasons:

1. The proposed rule treats semi-automatic assault rifles as “non-military.” But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.
2. The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress’ proper role.
3. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government — i.e., taxpayers — will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.
4. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[3]
5. The rule reduces end-use controls for gun exports. It would eliminate the State Department’s Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Government’s information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporter’s history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.
6. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with



access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

7. The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.[4] The BIS's enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.
8. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.
9. This rule would transfer gun export licensing to an agency – the Commerce Department – whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.
10. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.[5] The export of these weapons should be subject to more controls, not less.

Message

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**From:** Khawam, Joseph N [KhawamJN@state.gov]  
**Sent:** 12/31/2019 8:56:56 PM  
**To:** PM-Staffers Mailbox [PM-StaffersMailbox@state.gov]; Windecker, Melissa A [WindeckerMA@state.gov]  
**Subject:** RE: Cats I-III AM - Large Files - Tab 3 Attachment 5  
**Attachments:** Tab 3 Att 5c - Public Comments to the Department of State Proposed Rule.pdf; Tab 3 Att 5d - Public Comments to the Department of State Proposed Rule.pdf

Email 2 of 5

Joseph N. Khawam  
Office of the Legal Adviser (L/PM)

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**From:** Khawam, Joseph N  
**Sent:** Tuesday, December 31, 2019 3:56 PM  
**To:** PM-Staffers Mailbox <PM-StaffersMailbox@state.gov>; Windecker, Melissa A <WindeckerMA@state.gov>  
**Subject:** Cats I-III AM - Large Files - Tab 3 Attachment 5

I'm not sure what the maximum limit is on emails, so I'm breaking Tab 3 Attachment 5 into five emails.

Email 1 of 5

Joseph N. Khawam  
Attorney-Adviser  
U.S. Department of State  
Office of the Legal Adviser (L/PM)  
2201 C Street NW, Suite 6420  
Washington, DC 20520  
(202) 647-8546 (T, W, T)  
(202) 663-2915 (M)  
(202) 663-3097 (F)  
Opennet: [KhawamJN@state.gov](mailto:KhawamJN@state.gov)



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-sz1f Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0850

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Catherine Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-nt2l Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0851

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lascinda Goetschius

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## General Comment

We don't need more guns. We need less guns Too many innocent people are being killed by Assault weapons

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-srds Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0852

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** James Cunningham

**Organization:** Guitar Instruction

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This is an incredibly bad idea the origin of which lies in a basis of greed and nothing else. To allow easier export of weapons with less oversight defies sound reasoning, common sense, and simple logic. We in the USA already have a severe problem with too many guns in the wrong hands as evidenced by the massive increase in mass shootings, the likes of which were exceptionally rare in our past. Why would we want to export that? If anything, we need to make it far more difficult to export weapons in order to address the all too common violence around the world. This is yet another senseless and foolish idea from the most corrupt administration in our nations history.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-gkc1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0853

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Gregory Fite

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## General Comment

I oppose the proposed rule change that would switch oversight of arms sales from the State Department to the Department of Commerce. This is an open invitation to uncontrollable arms sales for profit, over the interests of national security and public safety.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-w101 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0854

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Susan Schmidt

**Organization:** Schmidt Family Farms

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-mz05 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0855

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** jackie thiry

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## General Comment

I oppose switching the regulation of firearms exports from the State Department to the Commerce Department because it would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.



# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942q-rzm3
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0856

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathryn Burns

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## General Comment

I'm writing to protest a proposed switch of gun export regulations from the State Department to Commerce. This is unnerving. Guns aren't just a commodity to be traded; they can and to kill people. Firearms currently are classified as "military," which does make sense. Let's face it; guns kill. You don't want just anyone with a few extra dollars to buy weapons. Currently, the State Department can block the sale of large amounts of firearms, and I don't believe Commerce is set up to deal with that. Also, the State Department is informed of large sales, and if the arms are being sent to countries where we don't want them to go. Commerce deals in, well, commerce. National security isn't part of its mandate. Other problems with the proposal: A.) It would eliminate the State Departments Blue Lantern program, which dates to 1940 and carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

B.) It would remove licensing requirements for brokers, increasing the risk of trafficking. C.) It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. In short, the proposed change is a very bad idea. Please don't go through with it.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-209j Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0857

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Bridget Mahoney

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-5f63 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0858

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rey Diego

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## General Comment

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

-It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of prelicense and post-shipment inspections and publicly reports on them.

-It would remove licensing requirements for brokers, increasing the risk of trafficking.

-It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-z1te Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0859

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Marsha Malone

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-ky8k Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0860

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Eric Scheihagen

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## General Comment

I strongly oppose this proposed rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The export of firearms has serious national security, geopolitical and human rights implications, and should continue to be regulated by the State Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-flsq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0861

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Diane Anonymous

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## General Comment

I oppose the rule change that would switch firearm regulations from the State department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942q-01v0
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0862

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Deborah Cake

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## General Comment

July 3, 2018

Comment on International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

I couldnt be more astonished and dismayed that the gun lobby and industries are pushing for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).

Firearms are rightfully categorized as military, and are under the regulation of the State Department. Congress should continue to be automatically informed about sizeable weapons sales and have the authority to stop them when that poses a risk to our national security or threatens to increase human rights violations by facilitating weapons sales to oppressive regimes.

No one anywhere should be allowed to make firearms on a 3- printer. Period!  
Arms brokers should always be licensed, to try and prevent unlawful trafficking..  
And by no means should the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them, be dismantled.

The existing rules must be maintained and strengthened if switching the regulation of firearms exports from the State Department to the Commerce Department facilitates firearms exports to oppressive regimes, removes safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuels violence that destabilizes countries and causes mass migration.

Do not weaken our fire arm protections by a transfer of authority from the State Department to the Commerce Department. Do not feed into the global oppressors and black market by deregulation.

Thank you for taking this letter, my opinion, seriously.  
Deborah Cake  
01890

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## **Attachments**

I oppose this rule change that would switch the regulations of firearms export from the U



July 3, 2018

*Comment on* International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

*I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.*

I couldn't be more astonished and dismayed that the gun lobby and industries are pushing for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).

Firearms are rightfully categorized as "military", and are under the regulation of the State Department. Congress should continue to be automatically informed about sizeable weapons sales and have the authority to stop them when that poses a risk to our national security or threatens to increase human rights violations by facilitating weapons sales to oppressive regimes.

No one anywhere should be allowed to make firearms on a 3- printer. Period!  
Arms brokers should always be licensed, to try and prevent unlawful trafficking..  
And by no means should the State Department's Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them, be dismantled.

The existing rules must be maintained and strengthened if switching the regulation of firearms exports from the State Department to the Commerce Department facilitates firearms exports to oppressive regimes, removes safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuels violence that destabilizes countries and causes mass migration.

Do not weaken our fire arm protections by a transfer of authority from the State Department to the Commerce Department. Do not feed into the global oppressors and black market by deregulation.

Thank you for taking this letter, my opinion, seriously.

Deborah Cake

01890

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-ulti Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0863

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Carolyn Wall

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## General Comment

I vehemently oppose the proposed rule change to the ITAR. It is imperative that ANY weapons exports remain under the purview of the State Department. This is a national security issue and requires legislative involvement and strong enforcement. The Commerce Department is ill equipped to carry out such an important task.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-wbb9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0864

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Chris Casper

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## General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, making us all less safe. I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-dhki Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0865

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jen Han

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the US commerce department. Please dont do it! Thank you

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-wdkf Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0866

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Bryan Bennett

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-9m5e Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0867

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anne Drinkwater

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## General Comment

I oppose this rule change that would switch the regulation of firearms from the U S State department to the U S Department of commerce. Selling weapons outside of the US could be a threat to our security.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-daqw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0868

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rick Belding

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## General Comment

Making guns more available outside the US is a security issue to me. The State Department needs to keep control of gun trafficking. We do enough damage to outside nations through our military sales that we don't need to feed weapons to more groups or individuals. Please do not change this rule regarding US Munitions. For the good of the world.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-ufvk Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0869

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jeanne Dwyer

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-obod Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0870

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** anonymous Anonymous

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## General Comment

I very much oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

It makes no sense at all for us to allow the sale and export of arms that could end up in terrorist organizations, organized crime, traffickers of firearms, dangerous governments that should be under the control of the US State Department, not the Commerce Department.

This is an atrocity waiting to happen, and we can't allow this to happen. This is a disastrous idea and should never be implemented.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-650o Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0871

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Donna Bryant

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. With this rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Naturally, arms manufacturers would like this change because they are the most vile people on earth, dealing in death as they do. They have enough money; ditch this attempt to give them even more obscene profits by exporting death and destruction.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-ox00 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0872

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Amrita Burdick

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## General Comment

Given the current world situation with civilians dying in ever so many places, it makes a lot more sense to keep arms traffic under the Department of State, where arms sales can be monitored appropriately.

The Commerce Department does not have staff to adequately monitor arms sales, nor does it have a vested interest in keeping the world sane and peaceful. Unleashing arms sales to anyone (think organized crime, terrorist groups) would make the US and the world less safe. Human lives are more valuable than money. It's time to get US policies back in line with international mores and with our common values.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-q0h1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0873

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Geoff Hamer

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-z4em Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0874

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Carl Wallenmeyer

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## General Comment

We need fewer, not more, guns in the world. Please don't make the proposed change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I think this change would ultimately make the sale of weapons much too easy for the wrong people.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-1igp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0875

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Beth Lavelle

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## General Comment

I strongly oppose the transfer of gun and ammunition export control from the State Department to the Commerce Department. The oversight and staff needed to protect the American people from the shipment of arms and ammo to enemies, corrupt dictators and others intent on harming the American people is inadequate and inexperienced in the Commerce Department. The transfer would be a true dereliction of duty on the part of anyone entrusted with the safety and security of America.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-xbvl Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0876

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathy Madden-Bentle

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## General Comment

Military weapons have no place in public hands. Too many children are threatened and fear from their lives because of someone who is mentally deficient/challenged. Those who have been bullied are also at risk of turning their thoughts to murdering another child/adult because of the trauma caused them while being bullied. Automatic weapons should be stopped from any sales and destroyed once the military has finished with them.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942q-wwb7
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0877

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Croitiene ganMoryn

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## General Comment

I oppose this rule change.

With this rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. The Commerce Department just does not have the resources to adequately enforce export controls. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-hggx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0878

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rosalind Andrews

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## General Comment

Are the people in the Department of State losing their minds????

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-z7fw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0879

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Barbara and Jim Dale

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## General Comment

We strongly oppose the change that would place the sales of firearms internationally under the control of the Department of Commerce rather than the Department of State as has been the law.

Too many dangers exist in this proposal which seems to be based solely on profit motives.

Some of the changes that will cause problems are

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

We see the proliferation of guns anywhere as a threat to security, life and limb. To extend the curse that our country has come under to others around the world seems profoundly cruel and inhumane.

# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-942q-f807 <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0880

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jennifer Baratta

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## General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. HERES THE LOW DOWN: Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-zbpw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0881

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Leslie Wenberg

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## General Comment

I am extremely concerned about easy access to both guns and ammunition. This makes it simpler for people in the U.S. and traffickers overseas. Isis and others buy guns and ammunition here easily. They then use it in Terrorist Attacks around the world.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-jr0u Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0882

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joseph Lahm

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-uzj0 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0883

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** carol Denning

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## General Comment

I oppose the rule change about giving authority to Commerce department. The ban on 3-D printing of Weapons is essential to the protection of our planet. Also Blue Lantern has been effective; do not stop it now by transferring to understaffed and alternative mission of Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-uvob Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0884

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

We do not need to change this rule. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-f3hm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0885

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Naomi Peuse

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. This is very bad.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!



# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942q-eyw0
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0886

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Peter Brazitis

**Organization:** retired

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-8qew Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0887

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Raymond Zahra

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Regulation of these exports should remain under the jurisdiction of the State Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-m44s Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0888

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Allie S

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-7qox Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0889

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Annie McCombs

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## General Comment

I strenuously oppose this rule change. The Department of State is the proper oversight department for regulating the sales of arms outside U. S. borders. Reject this policy change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-xcqq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0890

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** jim Barber

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## General Comment

Firearms exports are classified as military at this time. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

It is a bad idea brought to you by the NRA, to make the world a more dangerous place than it already is.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-gy0q Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0891

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** John Hansen

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## General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-e90n Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0892

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Georgia Locker

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## General Comment

I STRONGLY OPPOSE SWITCHING THE GOVERNING OF ARMS FROM IT'S PRESENT DEPARTMENT FOR THE FOLLOWING REASONS:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
- 2.It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
- 3.It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

WE ALREADY ARE NOT SAFE IN THIS COUNTRY BECAUSE OF LAXITY IN PEOPLE IMPORTING AND BUYING ARMS IN THE COUNTRY. WE EXPORT AND MAKE OTHER COUNTRIES LESS SAFE. WE NEED TIGHTER RESTRICTIONS, NOT LOOSER ONES.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-4mp8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0893

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** John Hansen

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## General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-9viv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0894

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joseph Lipsey

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

The Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

This is totally unacceptable. We must not implement this rule change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-bg6t Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0895

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rebecca Hall

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-rz3y Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0896

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

This change would serve the gun manufacturers, terrorists and criminal gangs. It would serve NO ONE else. This is a really dumb idea.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-w61g Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0897

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Hazel Poolos

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## General Comment

I OPPOSE THIS RULE CHANGE THAT WOULD SWITCH THE REGULATIONS OF FIREARMS EXPORT FROM THE

UNITED STATES STATE DEPARTMENT TO THE UNITED STATE COMMERCE DEPARTMENT. THE SAFEGUARD OF

THE UNITED STATES IS MY FOCUS. WE AMERICANS' SAFETY IS MORE IMPORTANT THAN PROFIT.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-y8ps Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0898

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** William Sharfman

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## General Comment

Your proposed rule change would have the following effects, which are totally unacceptable in a civilized society:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-w6jw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0899

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Letticia Anonymous

**Organization:** Catholic Charities

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## General Comment

Firearms are dangerous

They kill people

There should be more regulations not Less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-xst2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0900

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** The Rev Charles H Hensel

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-orrx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0901

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jessica Blagen

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Don't do it.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-ptb0 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0902

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joanna Capitano

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-qk30 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0903

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Pamela Palencia

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## General Comment

I oppose the rule that would switch the regulations of firearms EXPORT to the US commerce Dept.  
YOu might be arming the enemy!!!! Think about it.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-nu2f Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0904

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Bob Railey

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## General Comment

I am registering my strong disapproval of the proposed transfer of oversight for export of firearms from the Dept. of State to the Dept. of Commerce. The Dept. of State has some interest in minimizing the amount of weaponry throughout the world. The Dept. of Commerce (especially under the Trump administration) will have as its only interest maximizing weaponry exported from the USA, without regard to where the weapons go.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-uyzy Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0905

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Julia Stevenson

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## General Comment

I fervently disagree with the idea of switching the regulation of firearms exports from the State Department to the Commerce Department.

The State Department is the proper entity to handle export licenses of semi-automatic assault weapons and other powerful firearms.

Transferring this authority to the US Commerce Dept would open new floodgates for arms sales internationally, with serious implications for our national security.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Such a move would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

I oppose this rule change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-vudh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0906

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Trisha Winn

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-8wmf Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0907

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. You can also copy and paste in other parts of this email, too, in order to make your case.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-7lhw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0908

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I run a small farm business and live in a rural area where guns and their use for hunting are common. I have no problem with such guns and their uses. I have a huge problem with the prevalence of assault weapons easily obtained in this country by just about anyone. Making it easier to ship guns overseas is even more horrifying considering how they could be used against this country and the peoples of the countries to whom we sell them. There should be much more control of guns...not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-fmpn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0909

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Catherine O'Neill

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-cnvy Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0910

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joanne Neale

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## General Comment

I strongly oppose this rule change which favors the interests of gun manufacturers over the safety of Americans. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-t7ws Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0911

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode much of the time. Many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Gun exporters that benefit from these sales should shoulder this cost instead.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking.

The rule would eliminate the State Departments Blue Lantern program for publicly reporting gun and ammunition exports. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to deny weapons licenses to violators. End-use controls also are weakened by eliminating registration of firearms exporters.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a

lethal weapon. The Commerce Department is unlikely to make the same argument. The new regulations effectively condone and enable 3D printing of firearms around the world. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could cause many preventable tragedies.

The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce. The BISs enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. The State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.

The rule would eliminate Congressional and public awareness of the total amount of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to an agency whose principle mission is to promote trade. Firearms are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-v1kv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0912

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Patricia Levin

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## General Comment

I am appalled the National Rifle Association wants guns for everyone, all around the world. I believe it is a terrible mistake to make a rule change which would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. This is dangerous! We have problems with these weapons in our country. Think about our national security if weapons made in the U.S. are used against us. It is totally disgusting the NRA wants to change the rules so they can sell weapons around the world to foreigners can maim and kill people around the world and come out of our country and kill us. All that matters to the NRA is selling more guns, not the safety of human beings.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-2m04 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0913

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Brenda Troup

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## General Comment

Do not allow the transfer of gun sales to the commerce dept! There are too many weapons sloshing about, killing civiliians and creating chaos. Letting an agency which just wants to sell more and more is not in the interest of humanity.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-hf53 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0914

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sue VanDerzee

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## General Comment

I oppose the rule change that would make arms sales regulated by the Commerce Department rather than the Department of State, where the responsibility lies now. This seems to me a short-sighted rule change which would make it easier for people around the world to kill each other, and us. When American safety is the buzz word in Washington, DC, why would a rule that makes us less safe even be considered?

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-r9n1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0915

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** D S

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-j045 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0916

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Patrick Bosold

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## General Comment

This rule is a really bad idea.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

All that, just for the sake of increasing sales volume and profits for U.S. weapons manufacturers?

This is terrible public policy, domestically and internationally. Please drop this proposed rule.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-gnez Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0917

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Marlene Stalter

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## General Comment

I am opposed to changes that would allow the NRA to export more weapons. The US has more guns and gun violence than any other country. The NRA will use these rule changes cynically to increase the already obscene amounts the weapons manufacturers already make. They are not concerned about the added danger to a world with too much violence and strife as it is.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-888b Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0918

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sharon Brown

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## General Comment

There is enough gun violence in the US to prevent sales here. Why would we wish this on anyone else? Please help the world from becoming a more dangerous place and vote against the sale of military grade weapons to commercial markets. Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-zcaw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0919

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Victor Escobar

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## General Comment

The rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-1juv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0920

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Leigh Anonymous

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## General Comment

I oppose this rule change which would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

This rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They're used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you for considering my thoughts to help make our country, and our world, a safer place.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-y2az Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0921

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Changing oversight of gun sales from the State Dept. to the Dept. of Commerce is an underhanded move to give more profits to gun manufacturers at the expense of the safety and security of everyone, everywhere. At a time when this administration is decrying the drug wars and the violence in Central America, this idea is crazy and dangerous to all countries, including the US.

Please do to allow this to happen. Innocent people will suffer, and the standing of our country will be soiled beyond measure.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-2soc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0922

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jennifer Heggie

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## General Comment

Moving arms regulations from the State Department to the Commerce Department will serve to destabilize the world further. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security. Firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. This change will definitely not "make America safer."

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-w1rp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0923

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-cvoe Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0924

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Renee Deljon

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## General Comment

I strongly OPPOSE any change that would move the handling of export licenses of semiautomatic assault weapons and other powerful (i.e., MILITARY-GRADE) firearms from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious NEGATIVE implications for our national security and LIVES around the world. Goddamn all you mercenary, death and destruction-causing fuckers.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-qjyc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0925

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Bill Holt

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We need fewer guns killing people, not more.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-2q2l Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0926

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kim Kaminsky

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would also allow the 3D printing of firearms. This is irresponsible and dangerous. I urge you not to implement this rule change. This is not well thought out and obvious that it is only to benefit the US manufacturers of fire arms.

Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-m7b5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0927

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lesley Boyland

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## General Comment

I am horrified to hear of a proposal to change the rules on the export licenses of semiautomatic assault weapons and other powerful firearms from being handled by the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

The Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

I understand that firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns.

Please, put our national security first and decline this alarming proposal.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-y1d5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0928

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Deborah Iredale

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## General Comment

It seems wrong to spread the possibility of unregulated firearms, whether within or outside the US.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-abp9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0929

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** richard smith

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## General Comment

Do NOT change the rules by which firearms are sold overseas. It's bad enough America is overrun and unregulated as far as firearms are concerned, but now weapons manufacturers supported by the NRA want to export weapons without the rules that the State Dept. requires. This is a moral abomination and should be rejected forthwith.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-ndxi Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0930

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** W. Andrew Stover

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## General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-th0q Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0931

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Arwen Griffith

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## General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Commerce should not be the primary driver in gun movement. Safety is much more important.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-hey2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0932

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mark Cosgriff

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## General Comment

I oppose this change.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-6ci0 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0933

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jane Tuvín

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## General Comment

Dear State Department and International ammunitions experts: this week is a true sampling and indication of the need to pass and enforce laws related to reducing the purchase of guns, ammunitions and etc. These weapons are purchased, resold and operated by people, who will use force on anyone and at anytimem

. We can't have our great country become this war zone. Please stop buying and selling of automated guns.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-7txz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0934

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Charles Bartoletti

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## General Comment

I strongly object to the sale of assault weapons produced by US gun manufacturers to private citizens around the world. We need to stop those sales in the US, not propogate them around the world. Have we lost our collective minds

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-u9oy Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0935

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Andrea Tennison

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Right now, firearms exports are rightly classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. This puts the safety of our Nation and our troops abroad at risk.

# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-942r-6u0z <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0936

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Katherine Howard

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## General Comment

I strongly oppose this rule change. Switching the regulation of firearms export from the US State Department to the US Department of Commerce is a bad idea.

# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-942r-whfy <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0937

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Patrick Reid

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## General Comment

I strongly oppose switching the regulation of firearms exports from the State Department to the Commerce Department. This misguided change would facilitate firearms exports to oppressive regimes, remove safeguards that help keep weapons out of the hands of bad actors like organized crime and terrorist organizations, and further fuel violence that destabilizes countries.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-muc4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0938

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Samuel Swift

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## General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain

rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[3]

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

Samuel R. Swift  
Attorney at Law  
San Jose, CA

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-ufz1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0939

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rebecca Nimmons

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## General Comment

There is a reason for regulations. People out to make a buck any way they can need to be reigned in. And the NRA has no conscience. Moving gun sales from the State Dept. to the Commerce Dept. would be catastrophic to this country and the world. We already sell guns and bombs and bombers to places that we shouldn't. We do not have the wisdom or compassion to make it easier for everybody to buy guns wherever they are or whoever they are. We need to limit guns everywhere to make our world safer. Our country is a very dangerous place because no leaders will regulate guns as they should. Are we mere Neanderthals? Do we have to spread violence and war everywhere? NO!!!!!!!!!!!!!!!!!!!!!!!!!!!!!! We must set an example...take the high road...teach a better way: peace. We'd all be happier and safer. And there's the Golden Rule. It's a good rule and we should obey it. That would mean lots more control over where guns are and who uses them for what purpose. Let's act like we are intelligent about this matter and do the right thing for the common good.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-zt3x Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0940

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Norma Kline

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. These are examples of how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
- 3.. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

I urge that the proposed rule change be denied and the U.S. Department of State continue to regulate the export of firearms.

Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-qy7l Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0941

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** David Young

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This change would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-kcdl Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0942

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nikita Hulbert

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-a8vt Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0943

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Richard Browman

**Organization:** Moms Rising

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-prep Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0944

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Susan Bush

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## General Comment

I think it is absurd, bordering on insane, to eliminate State Department Blue Lantern program, to remove licensing requirements for brokers, and to remove States block on 3D printing of firearms.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-986q Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0945

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Robert Mutascio

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## General Comment

This BENEFITS NO ONE except for gun manufacturers. And potentially HARMS many people. This is a very bad ruling.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-sbcm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0946

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Steve Aydelott

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-340o Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0947

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Barbara Bendio

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## General Comment

I am opposed to the rule change for international traffic in arms. There is no reason to change this rule, other than to increase sales of firearms. Please don't change the rule



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-zv6g Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0948

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kevin Crupi

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## General Comment

I oppose this proposed rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

In fact, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Additionally, switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. All these represent threats to U.S. national security.

I urge you to oppose this proposed rule change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-brkr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0949

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Trisha tenBroeke

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## General Comment

As a citizen concerned with our nation's security, I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I have deep concerns about the effect this rule change would cause. Specifically, I have many concerns, including that: it would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Again, I strongly oppose this rule change. Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-k2od Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0950

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose changing the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would make it easier for guns to end up in the hands of those outside of the law like organized crime and terrorist organizations and enemy regimes. It would further fuel violence that destabilizes countries and causes mass migration.

Selling guns outside of the US is NOT business as usual and must be monitored by expertise of the State Dept, not the Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-kbmu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0951

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Billy Angus

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## General Comment

Get rid of the NRA!!

They're nothing but a terrorist organization, plain and simple!!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-3r6y Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0952

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Peter Mattison

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## General Comment

I oppose this rule change that would switch regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are dangerous, and are used in to kill people around the world daily through organized crime, political violence, and terrorism. They should be subject to more controls, not fewer! Their trade and commerce should remain under the auspices of national security, not commerce.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-4c1x Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0953

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Maureen Clarke

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## General Comment

I oppose this rule change. Enough is enough! The world does not need more guns!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-f8as Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0954

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Geri Collecchia

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-uu26 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0955

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Karen Kwiatkowski

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I believe it would jepotdize our natuonal security.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-b238 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0956

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Roger Wess

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## General Comment

The Department of State needs to control the sale of arms out of this country, not the Department of Commerce.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-rw4w Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0957

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Erica Stanojevic

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## General Comment

How about we don't loosen restrictions on firearms.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

[4] American Guns Drive the Migrant Crisis That Trump Wants to Fix With a Wall, The Trace, May 25, 2017.

[5] The Trump administration proposes making gun exports easier. Heres how to submit your public comment on this dangerous proposal, Violence Policy Center.

[6] Ibid., Violence Policy Center.

[7] "U.S. requires group to remove 3-D gun instructions from its website," CNN.com, May 13, 2013.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-stz0 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0958

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

In regard to human life and the safety of our country we need to keep the sale of all assault weapons and all firearms under the U.S. State Department and not allow it to be transferred to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-b8uy Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0959

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Henry Lewis

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## General Comment

As an American teacher and someone who cares deeply about ending random violence and human rights abuses around the world, I firmly OPPOSE the rule change that would move the handling of export licenses for semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. Personally, I don't trust American weapons manufacturers to be ethical when it comes to such foreign sales. In addition, the Commerce Department isn't structure to handle proper oversight of such sales.

Making it easier for weapons manufacturers to sell their wares without the oversight of the US Congress is insanity and flies in the face of everything the Trump administration says about trying to keep the Homeland safe from foreign terror and gang threats. Investigations have shown that many of the weapons used in drug and terror related crimes in Latin America (where I'm currently living and teaching) already originate in the USA. Taking away Congress's and the US State Department's oversight of large sales of semi-automatic weapons will only increase the violence in countries where human rights abuses are now common place. This, in turn, will cause more refugees to flee violence-plagued countries and attempt to cross into the USA illegally.

Isn't anyone in Washington, D. C. these days able to use critical thinking skills and connect the dots. The violence always makes it's way back to (and inside) America's borders.

I urge you to reject this rule change!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-se4e Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0960

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

This seems like a dangerous threat to our national security. I am against changes to this regulation.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-f0am Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0961

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Dorothy Stegman

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## General Comment

I oppose this rule change which would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-s6bp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0962

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** william gorenfeld

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## General Comment

More guns world wide = more violence.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-9zy6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0963

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Barbara Armstrong-Magwood

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## General Comment

HERES THE LOW DOWN: Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-jwh2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0964

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nancy R Bogen

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-3fnn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0965

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Laurie Funaroff

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## General Comment

Urgent. Do not switch firearms from control by state department to control by commerce dept.

This will promote more violence, destabilizing more governments and forcing more migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-vq46 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0966

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rebecca Chase-Chen

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-dbqy Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0967

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nicholas S Costa

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-piut Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0968

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kristy Johnson

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## General Comment

This is absolutely absurd. Let's let the firearms manufacturers export guns so that they could possibly be used against our own citizens and soldiers. Tell the NRA NO, not only NO but HELL NO!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-lzf6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0969

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Cheryl Farmer MD

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## General Comment

Friends, I write in OPPOSITION to a rules change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would facilitate vastly increased sales of arms internationally, with serious implications for our national security. Such a policy could lead to an unfortunate future situation where our own combat troops face troublemakers armed with American made weaponry. This would be an unacceptable outcome! Please maintain the status quo on this issue, as current regulations have been effective for decades.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-6cb5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0970

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Robin Walden

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## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! It is unthinkable that the US would be considering promoting the sale of assault weapons world-wide.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-cb82 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0971

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Susan Faigle

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The following reasons highlight why the change should not occur:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-9ftf Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0972

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anne Koster

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-yudu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0973

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Olga Abella

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-2swv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0974

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Susan Hubbard-Reeves

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

For multiple reasons, this rule change is not in the interests of the American people and I am in opposition to the change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-mwu5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0975

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Linda Carroll

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## General Comment

I oppose the transfer of authority over the sales of guns from the State Department to the Commerce Department. Guns involve many factors that put them out of the realm of simple commerce.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-i7n9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0976

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Karen Howard

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## General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change to move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

At present, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security. Weapons sales even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles in obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program (in place since 1940), which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting

made it possible for anyone with access to a 3D printer, anywhere in the world, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The motto is Make America Great Again our new motto should be KEEP AMERICA SAFE.

Dont allow this transfer occur.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-77q2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0977

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jonathan Weinstock

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department, as it would:

- eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
  - remove licensing requirements for brokers, increasing the risk of trafficking.
  - remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.
- All of this would create a more dangerous society and world.

Thanks very much,  
Jonathan

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-yf0w Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0978

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Paul Kivel

**Organization:** SURJ--Showing Up for Racial Justice

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-en7k Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0979

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Peter Reynolds

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## General Comment

I oppose the rules change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

This rules change benefits the NRA, not American National Security! I oppose it.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-yk7e Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0980

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mike Andrewjeski

**Organization:** self

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## General Comment

No No No No!

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-n8n6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0981

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-14rt Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0982

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Amy Haines

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## General Comment

Please maintain control of Arms and weapons sales through the State Dept. Weapon sales need to be monitored and kept under tight control. Thank you

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-htrr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0983

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Diana Truax

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## General Comment

I oppose the rule change that would switch the regulation of firearm exports from the US State Department to the US Commerce Department. Doing this could encourage the sale of large caches of weapons to foreign governments and organizations further endangering the US citizens.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-twuy Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0984

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lari Tiller Howell

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## General Comment

I understand that the NRA is pushing for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

I fear that this would be the undoing of civilizing as we know it. At this point in history, with record unrest, human migration and displacement, adding more arms is disaster to the common man. Governments cannot win, peace cannot win, humanity cannot win. Changing the overseeing cabinet depart from the State to the Commerce department can only be for the purpose of selling death.

All it will do is control population growth. ZPG

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-w5q1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0985

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** David Varnum

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## General Comment

Jurisdiction over U.S. gun exports should be kept within the U.S. Department of State, and NOT transferred to the Department of Commerce.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-kz9a Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0986

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-izeh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0987

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Dori Goldman

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-tbjt Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0988

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Laurie Price

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## General Comment

No way!! This is the last thing we need. Please, no more.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-q01g Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0989

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Christopher Ivancevic

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## General Comment

This is an ABSOLUTE HORRIBLE IDEA! Just insane. This idea that one bullet for one pull of the trigger is somehow not worthy of maximum oversight is just naive at the least, and a complete disregard for human life at the worst. The state department must continue to safeguard our nation and oversee all firearm sales. This attempt to switch it to the Commerce Department is nothing more than a reckless money grab at the risk of human lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-7mf4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0990

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Judith Anonymous

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## General Comment

I strongly oppose the proposed rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-iqu3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0991

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Donald Rumph

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

I also believe that the United states has showered more than enough grief on citizens of the world through the excess gifting and sale of military weapons, including firearms but not forgetting shoulder fired rockets, Abrams tanks, F-35 fighters, and the list goes on. WE need to get in the peace business.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-4luz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0992

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Barbara Wood

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## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-aohj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0993

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anne Hepfer

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. it would allow more arms to enter the U.S., which would cause more shootings due to the availability.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-c4i7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0994

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sandra Woodall

**Organization:** Lady Freethinker

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## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-vctv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0995

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Pamela LaRue

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## General Comment

Our national security comes first. Please keep control of arms sales abroad under control of the State Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-2kdm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0996

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Vaughan Greene

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## General Comment

Don't make it easier to export firearms. They usually end up with the wrong people anyway.  
ENOUGH with guns everywhere.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-y1os Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0997

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Hildy Feen

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## General Comment

I strongly oppose the rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Below are more reasons why the proposed rule change should not be approved:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

It would impact our national security by facilitating firearms exports to oppressive regimes, removing safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fueling violence that destabilizes countries and causes mass migration. The world needs less firearms, not more.

Humanity needs less killing, not more.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-hdv5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0998

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Patricia Dishman

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## General Comment

Dear Sir:

I strongly oppose the proposal to switch the regulation of firearms from the U.S. State Department to the U.S. Department of Commerce. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would make the world a far more dangerous place. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would also remove licensing requirements for brokers, increasing the risk of trafficking. Additionally it would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

In summary, firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-kvrj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0999

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The US State Department is better equipped to keep in mind the security of the USA.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-u8z3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1000

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rose Aranita

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## General Comment

The proposed changes to regulating international weapons sales opens the door to increased violence in other countries where human rights are at risk, strengthening of local gangs having access to more dangerous weapons, endangers fragile democracies threatened by tyrannical groups, and increases dangers to civil peace and families. For these reasons, I oppose the shifting of weapons deals to the Commerce Department. The globe and local citizens would be in danger of losing harmonious governance and peace in our families across the world.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-9coz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1001

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Allan Campbell

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## General Comment

I oppose this rule because it would allow more firearms. Because the regulations should not be changed to the Commerce department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-tm3v Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1002

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Robert Thompsson

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## General Comment

Shifting management of international trade in arms from the state department to commerce is NOT a good idea at all. The commerce platform will shift the focus from common sense safety to selling as many guns as possible. Do not do it. RSTHOMPSON MD



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-4rbr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1003

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elizabeth Craft

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-tj0x Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1004

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** C. Warren Pope

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## General Comment

This relaxation in export rules for firearms is ridiculous and must be defeated. More guns means more death and more murders. Don't we have enough trouble in the US?

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-z14v Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1005

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lester Stano

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It would eliminate the State Department's Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Department's block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-z8t2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1006

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-5074 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1007

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** PJ Lents

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-9a44 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1008

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Clara Salloom

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## General Comment

I oppose this rule change that would switch the regulation of firearms export from the State Department to the Commerce Department. This change would have serious implications for our national security. Firearms export regulations should continue to be the responsibility of the State Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-kjla Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1009

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Christina Duck

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It's an absolute outrage that this is even happening. We will just be arming more terrorists with weapons. Don't let this happen!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-z8lz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1010

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Franco Ferrer-San Miguel

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.



# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-942r-fa83 <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1011

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** David Sherman

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## General Comment

I oppose this rule change that would switch the regulation of firearms export from the U.S. State Department to the U.S. Commerce Department.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

This rule change would make the world a far more dangerous place:

- \* It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

- \* It would remove licensing requirements for brokers, increasing the risk of trafficking.

- \* It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-oo7t Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1012

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Arthur Burzykowski

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-ifm2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1013

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** L. Adams

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## General Comment

I am against changing the regulatory oversight for arms sales to the commerce department. We do not need to be shipping weapons overseas to people like Duterte & Erdogan.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-e9bv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1014

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Terri Coppersmith

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Please do not change the rules that help make our country and our world a safer place.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-hav3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1015

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Catherine Zarate

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## General Comment

I oppose this rule change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-n0zn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1016

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-439q Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1017

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nanette griesi

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-yp3l Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1018

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jody Benson

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## General Comment

As a gun owner, former hunter, and former ARCAO (Korea: Camp Henry, Camp Humphries, Camp Casey 71/72 when these bases were primitive), I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I do not want weapons in the hands of terrorists and criminals in other countries that can be used, not only against their own people, but against Americans abroad.

Ive travelled the world and been in many conflict zones, including Afghanistan. The lawlessness of these areas is exacerbated by the fact that everybody owns a weapon. Small arms and light weapons are the preferred weapon of these small-time bullies, drug dealers, and cartels, as well as big-time terrorists like ISIS, al-Qaeda, al-Shabaab, Boko Haram.

Making light weapons (the definition includes: revolvers and self-loading pistols, rifles and carbines, assault rifles, sub-machine guns and light machine guns) available as a commodity anybody can order without any restrictions over the internet, makes it easy for small arms dealers to buy and resell these weapons, the favorites of terrorists, criminals, and drug dealers. We dont want American criminals to have these weapons. Lets not loose them on innocent civilians around the world. Say no to any loosening of any restrictions of exporting weapons. Dont be tone deaf to American values. Americans dont want more foreign threats, any more than we want more communities disrupted by gun violence. Make it harder for these terrorists to get guns, not easier. Keep cheap guns out of the hands of these bullies. Keep American government workers, international corporate workers, and tourists safe from criminals. People over profit.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-181p Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1019

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** susan dickerson

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## General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

WE NEED TO BAN ALL SEMI, AUTOMATIC WEAPONS, BUMP STOCKS AND ASSAULT RIFLES/GUNS AND BUY BACK ALL OF THESE WEAPONS OF WAR.

Our country is being destroyed by guns. For the lives of the people, please do not pass this rule change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-mmpd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1020

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Suzanne Saul

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942r-sv65
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1021

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** James Roberts

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## General Comment

Recently proposed, suggestion is a tragedy to humankind- expanding USAs reputation as merchant of death to civilians. Bad enough America is already known for it in military weapons.

Gun manufactures, NRA and others are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Everything coming out of this administration- coal to soybeans, to auto parts, to steel is labeled national security when true be told its corporate socialism and another white collar federally funded jobs program.

Export of weapons (all types, make, model, purpose) need to remain with State department not commerce.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-pm1m Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1022

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** John Keiser

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## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Please take action to help make America and the world a safer place.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-ieu7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1023

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change. It is unnecessary and not smart. Good for criminals only. Is this what we want to encourage unlimited bad guys with unlimited weapons with unlimited power? Some rules were not meant to be changed. It takes wisdom to know that. It takes conscience to act upon it and stand up for what is correct.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-lysr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1024

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Marissa Anonymous

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## General Comment

I oppose this change that would switch the regulation of firearms export from the US State Dept to the US Commerce Dept.

As a conservative, I am not against domestic gun sales, but I am against terrorism, and I feel strongly that national protection is more important than a few bucks of profit. We cannot let gun sales happen to foreign countries without tight regulation, and the US Commerce dept simply does not have the resources to adequately police foreign gun sales.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-zzkg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1025

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Susan Briggs

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

This rule would also remove the State Departments block on the 3D printing of firearms, made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-68pz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1026

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rinya Frisbie

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## General Comment

I am strongly opposed to the proposed rule change that would transfer the oversight of non-military firearms exports from the State Department to the Commerce Department. The proposed rule is supported by the NRA and the only purpose is to increase the profits for the US gun industry--one that loosing support in the USA. The only entity that is requesting this change is the gun lobby and it expects this change will increase firearms exports by 20%. This will put more guns in the hands of terrorists around the world. It is even more dangerous because it moves supervision and oversize to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more; this makes no sense. This seems like one more attempt to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have killed too many civilians already. Please do not approve this blatant corporate giveaway. The world does not need more instruments of mass killing--only the gun lobby would think this is a good idea. We the people are watching as you make these decisions. Please make them wisely as you will be accountable.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-29zh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1027

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Robert Hamm

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-zte9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1028

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Teresa Freedman

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-48oe Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1029

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Frank Hannwacker

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## General Comment

I oppose this rule change that would switch the regulations of firearms exports from the U.S State Dept. to the U.S Commerce Dept.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-ojz4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1030

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-zn53 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1031

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Megan Condit-Chadwick

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## General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Congress needs oversight of arms sales in order to ensure that the U.S. is not arming countries with human rights violations and those that may threaten our national security. The ban on 3D printing of weapons also needs to stay in place. Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-99i8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1032

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Natalie Blasco

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

I am opposed to this change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-ezaa Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1033

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** John Catherine

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## General Comment

To Whom It May Concern:

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The proposed rule change would make the world a far more dangerous place for the following reasons:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Thank you for your considerations.

Sincerely,

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-bmgi Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1034

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Margie Wagner

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We don't need to arm the world; we already have enough problems with firearms and gun violence in our own country. How can we be assured that guns will be in the hands of those in the right rather than our enemies? Have we learned nothing from past mistakes with firearms? Thank you.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-6gty Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1035

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** nancy august

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Here are a few of the reasons why:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942r-qq7g
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1036

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Here are details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

It would totally nullify the ability of the US to keep from arming dangerous foreign nationals, thereby making attacks on US soil far more likely.

This stupid idea to enrich the already rich arms dealers boggles the imagination!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-gwya Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1037

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joyce D

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## General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department

would

facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and

terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-8gii Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1038

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. It is unwise to increase access to these weapons domestically or internationally. I very much oppose this rule change as it would do much more harm than good.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-mthb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1039

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** winn wilson

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## General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-gmo2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1040

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jairo Angulo

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## General Comment

The Founding Fathers never intended for the average citizen to have semi-automatic and fully automatic guns.

# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-942r-vmpg <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1041

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sue Summerfield

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## General Comment

We do not need semiautomatic guns in the hands of everyone! There are already too many guns in the hands of irresponsible individuals. Stop the nonsense! Think Compassion!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-sr6h Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1042

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jessica Johnston-Walsh

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## General Comment

I am totally opposed to changing regulations of gun sale/exports from the U.S.State Dept. to the U.S. Commerce Dept. It would be against security for our country!



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-kgos Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1043

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Pat Dingleberry

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## General Comment

I think moving control of international firearms sales from the State Dept. to the Dept. of Commerce would be a huge mistake, especially because Congress would be out of the loop and this could have serious complications for the international community.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-grzu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1044

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joyce Sanseverino

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Y

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-k082 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1045

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lucy Sommer

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

For God's sake, don't do this. It is a disaster in the making.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-myt8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1046

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elizabeth Karen Bates

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-50qh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1047

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Margaret Quinlan

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## General Comment

I strenuously oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-6wri Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1048

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** laura harness

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## General Comment

Please keep arms regulations under the DOS to keep the world a safer place. Unregulated arms sales will increase violence in the world therefore increasing immigrants seeking asylum, such as those from central America. The commerce dept is focused on profit and isn't the appropriate organization to regulate arms sales.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-w75y Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1049

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Pat Annoni

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

I STRONGLY oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-vnpw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1050

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kerry Krebill

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Other very scary aspects of this change are:

- It would eliminate the State Departments Blue Lantern program, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- It would remove licensing requirements for brokers, increasing the risk of trafficking.
- It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. This alone is REALLY terrifying.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-t1mr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1051

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ben Indig

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## General Comment

I am writing in opposition to a proposed rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Please do not make the primary focus of international arms sales into an effort to increase American exports of firearms to help American businesses. The primary issue here is and should remain the military consequences of such export sales. As such, the State Department should continue to be in charge of such export licences.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-cptb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1052

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Amy Dewey

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## General Comment

I oppose switching the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-z5j5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1053

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joseph Barboza

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## General Comment

I oppose this proposed rule change... the Commerce Department absolutely should not be regulating international arms sales, period. That is the worst idea to come out of the administration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-3yf9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1054

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elizabeth Connors-Keith

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S.

Commerce Department. With the rule change, Congress would no longer be automatically informed about sizable weapons

sales that it could stop in the name of national security, even to countries where there are serious human rights concerns.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau

of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist

organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-5ejm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1055

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** p perry

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## General Comment

Guns are not the answer to our ills. Please think twice before doing this.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-myi3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1056

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Janet Smarr

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## General Comment

I strongly oppose the transfer of licensing semiautomatic and other high-powered weapons exports from the U.S. State Department, which is focused on safeguarding our nation, to the U.S. Commerce Department, which is focused on promoting American sales. This would obviously greatly increase the unregulated sale of dangerous weapons to organized crime, tyrannical regimes, and terrorist organizations, making us all less safe. These gun sales would increase the violence that is causing mass migrations and the problems that entails for countries (here or in Europe) that are confronted with large numbers of refugees fleeing violence. Firearms are quite rightly categorized as military, and their export needs to be carefully restrained, not encouraged. Gun companies will profit; everyone else will be seriously harmed.

The proposed transfer would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking to criminal and terrorist purchasers. The Commerce Department does not have the means to check on and enforce regulations on the sale of weapons all over the globe. There will be a free-for-all of arms sales to the people and groups most dangerous to global peace and stability.

Furthermore, the proposed transfer would remove the State Departments block on the 3D printing of firearms. Once instructions for how to 3D print weapons were posted online, the State Department successfully charged the person posting that with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. More lethal weapons in the wrong hands mean more deaths of good and innocent folk. The proposed transfer of weapon exports from the State Department to the Commerce Department is totally irresponsible and extremely dangerous to the safety of everyone. I strongly urge you to oppose this proposed change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-goxr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1057

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** J Robuck

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-bu84 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1058

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Christina Sullivan

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-glfo Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1059

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Georgia Shankel

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## General Comment

People in my family have dies from gunshot wounds. People are murdered everyday in the City of Chicago. I hear gunshots at night after I go to bed or while I'm watching TV. This has to stop.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-w91v Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1060

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joseph Lawson

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## General Comment

The regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. It must not happen!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-st71 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1061

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lauren vreeland long

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## General Comment

Firearms exports must stay within the state dept and not the commerce dept where it will not have oversight.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-7c5f Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1062

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** John Zimmermann

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## General Comment

I write regarding the pending plan to switch the regulation of firearms exports from the State Department to the Commerce Department

This is a bad idea that would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

This rule change would make the world a far more dangerous place for several reasons. First, it would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. Secondly it would remove licensing requirements for brokers, increasing the risk of trafficking. Third, it would remove the State Departments block on the 3D printing of firearms.

When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. That cannot be good.

Please do not allow the regulation of firearms exports to be taken away from the State Department, such a move would be enormously irresponsible and damaging to the safety of these United States. Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-xo7x Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1063

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** A Patterson

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## General Comment

I oppose the rule change switching the regulation of firearms exports from the State Department to the Commerce Department. That rule change would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Please do NOT change it.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-cxuo Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1064

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** David Soares

**Organization:** none

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

HERES THE LOW DOWN: Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-1z2d Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1065

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kae Bender

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The U.S. State Department focuses on safeguarding our nation whereas the U.S. Commerce Department focuses on promoting American business. Clearly the concern of firearms in the wrong hands is of fundamental concern to the State Department, whereas the Commerce Department would only want to sell more arms abroa. We must insist that the security of our nation take precedence over the profits of some arms providers.

Firearms exports are rightly classified as military" and blocking sales of large batches of firearms to foreign countries is a reasonable control to prevent the unleashing of weapons into the hands of those who could cause serious harm to human rights, international relations, or even our own national security. Further, commercial export of large caches of American guns and ammunition could make it too easy for firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents to obtain enough weapons to wreak havoc around the world. These are serious concerns.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Exporting firearms should be subject to more controls, not less! The Commerce Dept. is NOT ready or able to maintain the stringent controls and oversight that is needed to keep weapons trade restricted enough to handle export licensing, shipment inspections, and other appropriate restrictions on the types, quantities, and categories of firearms exports.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-sl87 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1066

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Carol Olivier

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## General Comment

I reject changing from state dept to commerce department regulation of international gun sales.  
Everything we do destabilizes the world with violence.it is unconscionable to sell more weapons.  
Sincerely Carol Olivier



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-ulio Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1067

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Steven Boss

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## General Comment

Don't allow the NRA to dictate what is best for our national interests with this new proposed rule. It will only make the world less safe in the end. So please reject this rule.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-do6t Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1068

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Connie Marquez

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## General Comment

We need more controls over guns and weapons, and fewer of them.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-khcv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1069

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Faye Soares

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-ni6g Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1070

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Maryellen Redish

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-s5bi Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1071

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Cathleen Scharosch

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## General Comment

No sale of firearms to foreign countries!!

No change of firearm management from US State Dept to US Commerce Dept!!

There is no common sense in making any of these changes.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-9a1x Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1072

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Bree M

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The proposed rule would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. The risk of trafficking would increase because there would no longer be licensing requirements for brokers.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

This rule would create more unnecessary chaos and violence.

Keep more controls on guns, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-8z8n Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1073

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Kissane

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## General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. The rule change would make the world a far more dangerous place.

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

All of these changes will make the world more dangerous and our country less secure. Please do not enact this rule change.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-t0v7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1074

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** donnasue jacobi

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. those guns will only be used against USA citizens -- try to get a handle on safety.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-fvyj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1075

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Betty Kissilove

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## General Comment

I very strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with very serious implications for our national security.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-l8g5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1076

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jennifer Dingman

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Please keep the regulations of firearm export under the responsibility of the U.S. State Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-s53s Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1077

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Andrew Aguiar

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## General Comment

We dont need more commerce involving the gun trade!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-s9uc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1078

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Francis Fedoroff

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Guns are weapons not commodities. Gun sales require special oversight.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-cjj8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1079

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathy Yeomans

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## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! Guns have only one use and that is to kill.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-3tru Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1080

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Edward Esler

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. I oppose any rule change here.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-2yct Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1081

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** William Maynard

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-gp37 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1082

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** robert keenan

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-perh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1083

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathleen Smaluk-Nix

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-1x33 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1084

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Bart Ryan

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere.

This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

It would remove the State Departments block on the 3D printing of firearms.

When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Also...

More guns against America is more guns against America, no matter how thinly or big you slice it for Republicans or for Democrats. Even the Trump administration should realize how destructive and dangerous this really is.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-4h0s Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1085

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kim Myers

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## General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. How many more people have to be gunned down in the world or will it take the murder of someone in your family for it to finally hit home! I am trying to raise my 7 and 8 year old granddaughters, and if I could move to any other country to escape what is happening to America, I surely would. I do not want to raise them where going to school has become deadly. I am embarrassed to be an American. It is only about the money anymore.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-zfry Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1086

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rene Maas

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## General Comment

Hi I am a regular working mom whose kids are grown - so I don't worry about them in school now. However, if the State Department gives up control of gun and ammunition sales around the world, there is a terrible tragedy waiting to happen in another country with guns from the US. The State Department has more resources to track large sales and shipments and to keep Congress informed of these developments.

Please keep tracking of worldwide gun sales within the State Department - to keep us and the world safer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-z7k8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1087

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jeffrey Greif

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## General Comment

Firearms exports should continue be classified as "military" and remain under the control of the Department of State. I oppose the proposed rule change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-7lnq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1088

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch regulations of firearms export from US State Department to US Commerce Department. No! We have too many guns and gun deaths here in the US already.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-bvck Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1089

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lowell Richardson

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## General Comment

Why would we switch the regulation of firearms exports from the State Department to the Commerce Department? Our government should not be in the business of promoting lethal firearm sales around the world. We should reducing

We must limit firearms exports to oppressive regimes, not encourage them. We must strengthen safeguards that help keep organized crime and terrorist organizations from obtaining weapons, not weaken them.

Why would our government eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them?

One good example of the danger of unregulated gun sales is the rampant smuggling of guns across the Mexican border. The vast amount of weapons easily available across the boarder, sourced from unregulated American gun shows has turned Mexico into a killing field. We do not need to promote the same death and destruction in other parts of the world by removing licensing requirements for brokers.

And removing the State Departments block on the 3D printing of firearms BY transferring the authority to the Department of Commerce is simply ridiculous.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-j29i Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1090

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jennifer Zwick

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-rux5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1091

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Tom Secco

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## General Comment

Do not transfer export license responsibility for semiautomatic weapons etc. to the Commerce Dept. Sane rational people who have foreign policy interests as the basis of their decision making must be in control not the expedient mercenary interests like the NRA that dominate the Commerce Dept. Their licensing practices would help create violence on a massive global basis, all based on the love of money and their appetite for violence. Stop this movement away from prudence and reason.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-6oh4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1092

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Maria Diaz

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Currently, firearms exports are classified as Military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far less hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The following details on how the rule change would make the world a far more dangerous place concerns me:

- It would eliminate the State Departments Blue Lantern program (in place since 1940), which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

- It would remove licensing requirements for brokers, increasing the risk of trafficking.

- It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Again, I oppose the rule change because of all the dangers posed; it would make it easier for U.S. gun manufacturers to export firearms.

Please take action to help make our country and our world a safer place.  
Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-4llc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1093

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Martha White

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## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-5r4g Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1094

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jim Yarbrough

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## General Comment

I oppose this rule change that would switch the regulation of firearms export from the U.S. State Department to the U.S. Commerce Department. This rule change would dangerously reduce control and oversight of firearms. Firearms export should continue to be regulated by U.S. State Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-ik0p Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1095

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Maureen Knutsen

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-n8up Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1096

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Beth Osnes

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-cs02 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1097

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Dennis Alanen

**Organization:** none

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-ojpp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1098

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Samantha Turetsky

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-cw5d Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1099

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Dennis Bricker

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-m9pj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1100

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Carolyn Lilly

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department!

Stop the carnage of our children and all people! You have the power and therefore the responsibility!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-9zo1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1101

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Laurie Meisenheimer

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## General Comment

I can't even imagine that anyone who has followed the human carnage that arms dealers bring could even think of moving the regulation of selling of firearms from the US State Department to the Dept of Commerce. This is actually even worse than the other dozens of horrible things that have been proposed lately. Its worse than helping the ice caps melt.Its worse than drilling in the artic or putting lobbyists in charge of regulating pollution. Nothing is worse for individual suffering than more firepower. Dont even think about it!!!!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-8e6p Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1102

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Virgil Pauls

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## General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department

successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you for taking action to help make our country and our world a safer place.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-jjq6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1103

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sandra Goettling

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## General Comment

I think giving the gun industry, the right to sell arms internationally, without the state department overseeing the sales is a gobal disaster waiting to happen. Military weapons should only be sold to the military, not citizens.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-z7va Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1104

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Charles Kleymeyer

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-ujzk Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1105

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** jef weisel

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## General Comment

keep state department in charge of export licenses for weapons, especially semi- and automatic weapons!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-14im Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1106

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Alice Lo Cicero

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Further the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-8b2k Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1107

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Gail Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-dewa Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1108

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lisa Krausz

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## General Comment

Currently, firearms exports are classified as military. Thus, they are regulated by the State Department. The advantage of the current regulatory system is that Congress can block sales of large batches of firearms to foreign countries, including countries with human rights abuses. With the proposed rule change addressed here, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, again, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. This situation would be problematic because it would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. Further, it would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe, again, posing a serious threat to both national security and potential human rights abuses around the globe. For these reasons, I am against the proposed rule change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-ubl3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1109

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Barbara Holcomb

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## General Comment

The US is already one of the largest exporters of weapons. Please do not make this world more violent by enacting the proposed rule .

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-xo6b Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1110

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Gena DiLabio

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## General Comment

I strongly oppose switching the regulation of firearms exports from the State Department to the Commerce Department because it would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. The proposed rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please keep the regulation of firearms under the control of the State Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-jw49 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1111

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Margie Zalesak

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-8sli Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1112

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nancy Borelli

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## General Comment

Do not change the regulation of firearms exports from the State Department to the Commerce Department. The Commerce Department is not equipped to provide oversight of firearms exports. There would be an enormous risk of weapons getting into the hands of dangerous entities, and the world would be a much more dangerous place. Keep the regulation of exported firearms under the watchful eye of the State Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-hqvl Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1113

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Bruce Ente

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## General Comment

I strongly oppose the proposed rule that would shift responsibility for oversight of international arms sales from the Department of State to the Department of Commerce. Widespread export of military grade weapons outside the U.S. poses a serious and credible threat to national security, meaning control should be vested in the State Department not in the Commerce Department whose primary interest is business expansion and profitability. In addition, it is clear that the Commerce Department has neither the staffing levels nor the expertise required to monitor and manage arms sales abroad.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-l4ou Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1114

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Beth Levin

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## General Comment

switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-ye5x Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1115

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sue Whitlock

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## General Comment

ARE YOU CRAZY?!?! You want semi-automatic machine guns and other military guns in ANYBODY'S hands?!?! We would have no more national security and a lot of people would get killed!! Do not pass this!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-298i Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1116

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose switching the regulation of firearms exports from the State Department to the Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. This is an all around bad idea that would make everyone less safe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-ostj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1117

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Diana Walker

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## General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-plhp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1118

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-pszn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1119

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Dan Anonymous

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## General Comment

The Trump/Pence fascist regime must go!!!!!! In the name of humanity we refuse to accept a fascist America.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-9yhu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1120

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anne Edwards

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## General Comment

Dear committee:

I am Anne Edwards a resident of California. The export of U.S. made firearms is not a wise or ethical commercial business. Oversight belongs in the U.S. State Department. It is already shameful and frightening enough to have our American people and our new US immigrants shot down by weapons poorly regulated here in the mainland United States. If we allow the export of guns to become a commercial enterprise and not a State Department peace regulated issue, we push more violence on others and ourselves.

"I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Sincerely,

Anne S. Edwards.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-7kpa Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1121

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Deborah Meckler

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## General Comment

I oppose moving the regulation of overseas gun sales from the State Department to the Commerce Department. Guns are for killing people. They are not commodities to be sold like soybeans. They are ugly, killing machines. They should NOT be treated as if they were harmless merchandise. Why are we as a nation promoting killing?

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-m6nj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1122

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anne Jackson

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## General Comment

WE HAVE FAR TOO MANY GUNS ALREADY .. DO NOT CHANGE THEIR REGULATIONS  
FROM THE STATE DEPARTMENT TO THE COMMERCE DEPARTMENT !!!!!!!!!!!!!!!!!!!!!

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942s-t058
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1123

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nancy Dawson

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. With the rule

change,

Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. It would eliminate the State Department's Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Department's block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe

Sincerely,

Nancy Dawson

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-zyor Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1124

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nancy Dickson

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## General Comment

Please do not open the flood gates of weapon sales to all outside the United States which is what would happen if this became a 'business/commerce' decision rather than, as is the case now, your decision. We should not become arms sellers to the world - including terrorists and oppressive regimes. There are enough weapons in the world already to kill everyone many times over. Let's not make our country the one to add to this.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-claq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1125

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Martin Watts

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## General Comment

Believe it or not , NOBODY else on Earth wants to be like the US ! Especially regarding gun laws !  
Time the government became a lot more like the rest of the human race , and BANNED GUNS from the public !!!

# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-942s-rjxd <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1126

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lois Zeidman

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## General Comment

I am strongly opposed to the change of oversight of international gun sales. The Department of State, NOT the Department of Commerce, is the Department that currently is in charge of this and should continue to be the overseeing Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-2jpp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1127

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Linda Premo

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## General Comment

I oppose this new rule that will change the export of firearms from the US State Department to the US Commerce Department!!!!



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-qms3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1128

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Wood

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## General Comment

I am strongly opposed to the proposal to change the regulation of firearm sales from the state department to the department of commerce. A move like this would likely destabilize many other countries and places in the world by providing easier access to firearms with fewer regulations on who can purchase them and for what purpose. Firearm sales outside of the US are military deals and should be regulated and controlled tightly. I believe the state department is better equipped and prepared to provide this regulation than the commerce department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-rohj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1129

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am writing to strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This switch would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

This rule change would make the world a far more dangerous place, and I urge you to decide against it. Thank you.

# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-942s-d9jf <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1130

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Walter Bishop

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## General Comment

The arms that are sold are used to kill people. Charlie Chaplin made the movie, "The Great Dictator" in 1940 as a satire on dictators and war. President Eisenhower warned of the military/industrial complex. This change is to make arms sales easier on the international market for the arms companies profits and the worlds determent.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-o4bj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1131

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jorge De Cecco

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Thanks for rejecting this proposed rule.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-7ez7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1132

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ruth Sugerman

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## General Comment

My understanding is that most of the guns and ammunition in Mexico and other Central American countries come from the U S. Anything that increases this flow of arms to gangs and cartels will send more asylum seekers this way. We must be more responsible about arming criminals abroad.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-dm54 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1133

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Georgeanne Matranga

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Thank you for your attention to my profoundly grave concerns.

Sincerely,  
Georgeanne Matranga

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-pgwh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1134

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Dr. Demian

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## General Comment

DO NOT change the U.S. State Department rules regarding firearms exported from America.  
DO NOT allow the U.S. Commerce Department to have control of exports.

Thank you.

Dr. Demian

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-14mi Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1135

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-1v3q Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1136

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jenny Stanley

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-m2qy Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1137

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Amy Anderson

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

These weapons cause loss of life here at home in the US & we do not need to put them in the hands of possible terrorists or others with an agenda against the US. So many groups around the world would immediately use the weapons not for defense but for offense, to support causes the US does not support & take innocent lives. Let's not make it easier for them to get their hands on our weapons!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-dun1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1138

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Marilyn McClure

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. As a nation, we have already exported so many firearms to Mexico and Central America, that we are ruining their societies, making them more violent each day. I know with our present administration and their focus on money-making for the US, to move this to the Commerce Department would do this in so many other countries, as well. We must stop this harmful practice!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-wq8q Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1139

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Lindsay

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## General Comment

I oppose the proposed rule change that would switch the regulation of arms sales from the State Department to the Commerce Department. The US serves as a model by utilizing the special resources of the State Department to assure that arms exports are legal and dont result in international arms sales that may support rogue operators and illegal or terrorist activities abroad. State Department regulation of international arms sales helps assure that this unique type of commerce aligns with American foreign policy. The Commerce Department lacks the expertise and resources needed to provide this same type of oversight.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-9pkq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1140

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jonathan Boyne

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## General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-qwwwx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1141

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jean King

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

This change would

1. eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. remove licensing requirements for brokers, increasing the risk of trafficking.
3. remove the State Departments block on the 3D printing of firearms. The rule switch would effectively enabling 3D printing of firearms in the U.S. and around the world.

Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-ea7v Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1142

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** phillip pierce

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## General Comment

do not change the rules just for the NRA !!!!!!!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-ufcj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1143

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mark Setterberg

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## General Comment

Please do not move firearms registration/sales from the US State Department to the Commerce Department. The State Department is much better equipped to handle this task.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-d74r Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1144

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** RedLion York

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## General Comment

Howdy,

Switching the responsibility for overseeing weapons sales from the State Dept to the Commerce Dept is a bad idea for these reasons:

- a) It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- b) It would remove licensing requirements for brokers, increasing the risk of trafficking.
- c) It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The world is dangerous enough. We don't need this change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-6jvl Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1145

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Stephanie Wellemeyer

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## General Comment

Moving handling of export licensing of weapons shipped overseas from the Department of State to the Department of Commerce would flood the world with military type weapons. Organized crime and terrorist would have almost unrestricted access to high firepower weaponry. Violence prone dictatorships, and countries with few or no human rights protections could indiscriminately murder more of their citizens. Congress would not be automatically informed of large firearms shipments that it may have good reason to ban. Commerce doesn't have the staff or the training to carry out pre-license and post-shipment inspections and submit the required reports. It would also remove licensing requirements for brokers, increasing the possibility of trafficking, and it would remove the block on 3D printing of firearms. In effect, this would allow anyone with a 3D printer to produce lethal weapons.

Firearms are deadly. They are used to kill people every day, around the world, in acts of political violence, terrorism, organized crime and human rights violations. They must be subject to more controls, not fewer.

I strenuously oppose the rule change that would switch regulation of firearms export from the Department of State to the Department of Commerce.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-bgo9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1146

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. In my opinion, this is a bad decision that could have implications affecting our national security, and should be rejected outright.

Thank you for your time,

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-wa7i Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1147

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jo Coscia

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## General Comment

I oppose the switch of regulation of firearm sales from the state department to the commerce department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-lfcn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1148

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Phillip Crider Jr

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## General Comment

This particular change could potentially create a threat to United States national security.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942t-lw09
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1149

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Gerri Battistessa

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## General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-h2wj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1150

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Arlene Thomas

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## General Comment

Allowing arms sales outside of the US via the Commerce Dept. is much more of a threat to our national security than small children at our borders. This change further endangers our country...as have so many things proposed by this administration. Out of country arms sales should be regulated with legislative oversight as is currently the case. Do NOT allow this rule change to go forward.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-2f43 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1151

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Please do not transfer regulation of international arms sales to the Commerce department. The last thing we need is more international weapons trade. You know many of the guns will end up in the wrong hands and come back to bite us.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-3zuu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1152

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Peery

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. To do otherwise endangers all human beings and leaves the U.S. open to huge liability issues.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-jhyj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1153

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Andrea Bonnett

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## General Comment

I oppose this rule that would switch regulations from the US State Department to the Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-5u9h Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1154

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jean Schwinberg

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The U.S. Commerce Department is focused on promoting American business, not on safeguarding the nation, which is the responsibility of the U.S. State Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-taiw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1155

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Susan Mach

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## General Comment

The handling of export licenses for gun sales needs to stay in the hands of the State Department. The Commerce Department has no business dealing with this issue!

If we allow the NRA to manipulate these changes, the following issues arise:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please DO NOT allow these dangerous changes to be bought by a group that is not looking out for the welfare of this country, nor the world!

Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-19sp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1156

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Bruce Peery

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. To do otherwise endangers all human beings and leaves the U.S. open to huge liability issues.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-1n64 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1157

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** David Harrison

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## General Comment

I oppose this rule change. This transfer of authority from State to Commerce would open new floodgates for arms sales internationally, with serious implications for our national security.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-hgig Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1158

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Wallis Anonymous

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## General Comment

We are responsible for so much terrorism around the world because of weapons. Turn off the spigots of murder, kidnapping, from Central America, and the world. Bad legislation, which will increase terrorism for all good people of Earth.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-cilx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1159

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Gale Green

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## General Comment

Please do not put the sales of guns in the hands of the U.S. Dept. of Commerce. It is far too big of a responsibility for the people there to be expected to make life and death decisions on the fate of dangerous weapons.

In reality, the responsibility of a governing body is much more in line with reining in the rampant gun industry that threatens the lives of men, women and children everywhere. There needs to be sober thought and discussion before ever risking the lives of many who encounter the dangerous side of weapon proliferation. God be with you.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-sns0 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1160

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathy Magne

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. A move like this will make the world much more dangerous. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

- \* It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- \* It would remove licensing requirements for brokers, increasing the risk of trafficking.
- \* It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-1ouq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1161

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Arturo Urista

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## General Comment

I OPPOSE the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Presently, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as Turkey and the Philippines.

Meanwhile, the Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far less hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would make the world a far more dangerous place:

- It would eliminate the State Departments Blue Lantern program (in place since 1940), which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

- It would remove licensing requirements for brokers, increasing the risk of trafficking.

- It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized

crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Again, I oppose the rule change because of all the dangers posed; it would make it easier for U.S. gun manufacturers to export firearms.

Keep America, our country and our world a safer place!

Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-bw8i Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1162

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Margaret Stofsky

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The world does not need any more American guns!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-9g2w Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1163

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-67o9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1164

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** anonymous anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-1plc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1165

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Marilyn Ichioka

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-soza Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1166

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mo Kafka

**Organization:** 262-B Bradford St.

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## General Comment

Thank you for considering this important concern. Currently, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

It is essential that this rule not be changed as it will not benefit national security or international relations and it will make the world a more dangerous place.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-rljn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1167

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Onishea Aguilera

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## General Comment

I myself love guns but I do not support these weak gun laws and I never will support the crooked NRA!!!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-g4v1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1168

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sean Kelly

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## General Comment

I strongly oppose shifting firearms oversight from the State Department to the Commerce Department. Streamlining and encouraging the sale of firearms, and reducing inspections and enforcement, is solidly AGAINST the interests of the U.S.:

Internationally, high firearm availability correlates strongly with high firearm violence and fatalities. Making firearms more available WITHIN the U.S. by putting less scrutiny on shipments is the OPPOSITE of what we need to do in a climate of increasing criminal shooting acts.

Many of the most pressing international crises, from conflict in the middle east to the migration crisis from Central America, are fueled by violence utilizing American-made weapons. By making it easier to get American firearms abroad, we are only jeopardizing our OWN national interests.

While it is ultimately impossible to outright prevent individuals from acquiring information to design and/or manufacture firearms and components via 3D printing techniques, it is senseless to remove existing barriers to doing so. More firearms of questionable quality in the hands of more people with questionable training is an absolute recipe for disaster.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-yps2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1169

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Patricia Always

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## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-83df Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1170

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mark Bernard

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## General Comment

I urge prevention of this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Guns are of killing people, and this is a national security issue, and not just some trade issue.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-qxx5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1171

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Philip Shook

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-grj4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1172

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Susan Pasternack

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## General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-x60b Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1173

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Pete Wilson

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-9yri Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1174

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anne Gunderson

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-t4on Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1175

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Max Nupen

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-k0d3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1176

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nancy Lemmon

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It seems IRRESPONSIBLE to hand over such a sensitive matter to our national security to a body focused on commerce.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-jtzd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1177

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Amy Cervene

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-qgg3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1178

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose the change of regulation of firearms exports from the State Department to the Commerce Department. I feel this would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Firearms are not a mere commodity and need the oversight of the State Department as they are a national security concern.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-g7nf Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1179

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Bissell

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## General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

- 1.) It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- 2.) It would remove licensing requirements for brokers, increasing the risk of trafficking.
- 3.) It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-j9og Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1180

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** John Malcolm

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## General Comment

Great idea. Let's sell our enemies the weapons they need to use against us. As long as someone is making money, it should be OK (?) Are you out of your goddamned minds?

This is a legitimate question.

John L. Malcolm

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-6usb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1181

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Thomas Diehl

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## General Comment

Firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-p4gr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1182

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ron Unger

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

This is a blatant attempt to hide weapons sales from public oversight and to bypass existing controls over weapons exports which benefit no one on earth except the owners of the weapons manufacturing companies.

This rule change is not in the best interest of the people inside or outside of America and should not be approved.

We need less proliferation of weapons around the world, not more. This proposed rule change will result in more death and destruction and physical and psychological damage with no benefit to anyone except a few who will profit handily from the increased sales.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-ddqy Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1183

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Marjorie Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-gv8d Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1184

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Colleen McGlone

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-o3u0 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1185

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose changing the regulation of firearms exports from the State Department to the Commerce Department. That change would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration, making the world a far more dangerous place. The Commerce Department is not equipped to manage the global security issues that the rule change would cause.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-1bpx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1186

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Mobley

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## General Comment

We MUST stop these guns that are killing our children! NOW!!!!!!!!!!!!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-1lmt Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1187

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Wendy Walker

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## General Comment

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Please do not allow this to happen. BAD idea.  
Wendy Walker

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-kj83 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1188

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Montie Richards

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## General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for national security. Weapons could be sold even to countries where there are serious human rights concerns, such as the Philippines and Turkey, and I understand Congress would no longer be automatically notified so it could stop such sales. Firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-bddb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1189

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** ELLIOT PLINER

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## General Comment

I OPPOSE THIS RULE CHANGE THAT WOULD SWITCH THE REGULATIONS OF FIREARMS EXPORT FROM THE U.S. STATE DEPARTMENT TO THE U.S. COMMERCE DEPARTMENT.

THE COMMERCE DEPARTMENT DOES NOT HAVE THE RESOURCES TO ADEQUATELY ENFORCE EXPORT CONTROLS.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-zmw9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1190

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-bs2l Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1191

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Matthew Boguske

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-hpba Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1192

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Katy Paynich

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department because switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-awuq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-1193

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Justin Mebane

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## General Comment

This rule change will transfer regulation of foreign arms from the State Department to the Commerce Department - which does not have the resources necessary to keep track of these sales. This would be a major threat to our national security and fuel instability in other countries - increasing migration to the US. This rule needs to be rejected immediately.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93f9-oql0 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0002

Comment on DOS\_FRDOC\_0001-4527

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I fully support the US State Department's proposal to amend the International Traffic in Arms Regulations (ITAR) to revise Categories I (firearms, close assault weapons and combat shotguns), II (guns and armament) and III (ammunition and ordnance) of the U.S. Munitions List (USML) to describe more precisely the articles warranting export and temporary import control on the USML. Items removed from the USML would become subject to the Export Administration Regulations (EAR).

This improvement to US regulations will help legitimate commerce and to help the competitiveness of American companies in international trade.

Thank you for the opportunity to support this important change to Federal regulations.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93d5-doam Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0003

Comment on DOS\_FRDOC\_0001-4527

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## Submitter Information

**Name:** Merlin Larsen

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## General Comment

I am responding as a life member of the NRA, at the behest of an NRA-ILA email alert to do so. I am in complete agreement that these changes to the economic strictures on guns and components, that are of civilian application and use, are necessary and should be done. Loosened or eased commercial regulations on US gun manufacturers and the components thereof, will make the US economy improve by being more competitive internationally. Meanwhile, the strictly military weapons and components will remain highly regulated (scrutinized), as they should be.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93cr-lr9s Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0004

Comment on DOS\_FRDOC\_0001-4527

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## Submitter Information

**Name:** Jonathan Sawyer

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## General Comment

As an American citizen I urge you to carry through with this change. It will take a large burden off of the small businesses and allow them to build the American dream they set out for years ago. Thank you for your consideration

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93h6-hc5l Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0005

Comment on DOS\_FRDOC\_0001-4527

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## Submitter Information

**Name:** James Morris

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## General Comment

I agree with the elimination of the annual \$2,250 fee required by the Department of States Directorate of Defense Trade Control (DDTC), which the Obama administration imposed on gunsmiths who manufacture firearms and ammunition. That fee unfairly targeted and disadvantaged Small Businesses manufacturing a few firearms per year. Small businesses that manufacture approximately 25 firearms a year, such as custom gun builders, would have to recover the ITAR fee by increasing the cost of each weapon by nearly \$100. This makes it nearly impossible for small business that manufacture firearms to compete against the prices of larger businesses that can recover the \$2,250 fee over hundreds or thousands of firearms.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93ea-6g13 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0006

Comment on DOS\_FRDOC\_0001-4527

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## Submitter Information

**Name:** joe plano

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## General Comment

Why is there not a section that REPEALS the terrible practice of engraving imported firearms into the USA with the importers name on the side of the firearm?

This Damages the firearm immediately, immediately makes the firearm less valuable, and is completely and utterly pointless for any other reason that " this is how we have always done it ".

Lets change some IMPORT LAWS as well here so that valuable, collectible firearms are not defaced by ridiculous government regulations.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93ds-xzss Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0007

Comment on DOS\_FRDOC\_0001-4527

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## Submitter Information

**Name:** Karl Lippard

**Organization:** People of the United States

**Government Agency Type:** Local

**Government Agency:** none

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## General Comment

ITAR in its present form is TREASON against the American public and 2nd Amendment. ITAR circumvents Federal Law pursuant to License of manufacture, distribution and exportation of any and all components. Such Licenses hold that interpretation of the law rests with the license holder. State and Federal Government only enforce the law. First National Gunbanque, Corp vs Bomar Corp., Federal Court Gainesville, GA circa 2003 where this statement was upheld in the 12 page decision....Further ITAR presumes to offer a assigned number only by which one can do business. It has no examiner known, can issue or withhold at will without benefit of law or reason. It can without any supervision, or regulation deny ALL public access to arms, ammunition, components or parts for firearms. This in violation of the 2nd amendment where among other things guarantees our right to take back a government where tyranny has come to exist....Tyranny does exist today in America at the highest level of government. A government created to insure disarmament of it citizens by control of its arms and ammunition. It allows the open invasion of people through our boarders. It allows through ITAR foreign control of our ability to defend ourselves and those of our allies. It is a fraud on the American people....Additionally it states to charge an annual fee that covers ALL CITIZENS THAT MANUFACTURE ALL GOODS TO PAY THIS ANNUAL FEE OF \$2,500.00, PLUS \$250.00 FEE PER CONTRACT, PART OR SHIPMENT. THIS IS UNLAWFUL TAXATION WITHOUT REPRESENTATION....Therefore let it be known that this is TREASON against the American people. We call on our president to reject, dismantle or correct this Obama inspired act. If not this single regulation; is an act of WAR on the American people. I call for a Constitutional Convention. If not a state of war will exist among the People of the United States until rectified.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93gd-t93o Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0008

Comment on DOS\_FRDOC\_0001-4527

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## Submitter Information

**Name:** Judy Mouradian

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## General Comment

I am appalled that this administration is proposing that responsibility for overseas gun sales move from the State Department to the Commerce Department. There is only one purpose for this - to ease restrictions on overseas gun sales - helping U.S. gun manufacturers to sell more guns. The outcome would be catastrophic. These guns would be sold to the very countries that already breed violent drug gangs, causing their citizens to flee to the U.S. Do we really want to spread the gun violence that is happening in our country to other countries? Do we want to create more deaths and drug trafficking? Do we want to create more homeless refugees? This is a lose-lose situation for everyone except gun manufacturers and the NRA. Please stop this horrible proposal!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93cv-6cds Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0009

Comment on DOS\_FRDOC\_0001-4527

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## Submitter Information

**Name:** Thomas Goodwin

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## General Comment

Currently, many small firearms companies have many regulations stacked against them. Even some gunsmithing is pushing gunsmiths into a manufacturer category. This is just one of the many problems that could be changed with this proposed rule. It's time we reclassified many of these items and services to remove them from the ITAR and USML and place them on the CCL. Free up the market for our small companies and let the industry thrive.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93fr-qr1f Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0010

Comment on DOS\_FRDOC\_0001-4527

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## Submitter Information

**Name:** Allan Haley

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## General Comment

President Trumps New Proposal for easing restrictions on overseas gun sales is counter the well-being of American citizens. It would accelerate gun sales to Mexican and Central American violent gangs creating more violence in these countries. This would spur more immigration to the US. In addition, along with increased drug gang power would come more illegal drugs flowing into the US.

This proposal is a bad idea.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93d3-7n96 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0011

Comment on DOS\_FRDOC\_0001-4527

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## Submitter Information

**Name:** Clem MacIlravie

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## General Comment

Proceed.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93d1-6eqx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0012

Comment on DOS\_FRDOC\_0001-4527

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## Submitter Information

**Name:** M. Anonymous

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## General Comment

This looks like a good, common sense, fiscally advantageous move. I look forward to these changes being implemented.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93eg-elqw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0013

Comment on DOS\_FRDOC\_0001-4527

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## Submitter Information

**Name:** Ron Gablehouse

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## General Comment

Repeal the requirement that individuals traveling abroad with firearms strictly for hunting or competition must document the export of their firearms through an official website designed for commercial exports.

Remove sound suppressors from the USML.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93en-34au Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0014

Comment on DOS\_FRDOC\_0001-4527

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## Submitter Information

**Name:** David Brach

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## General Comment

These new proposed rules are a good start, but please make it easier for people to travel abroad with weapons for hunting or competition. Also, please make it easier on suppressor manufacturers by changing them to non military.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93dp-2ye9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0015

Comment on DOS\_FRDOC\_0001-4527

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## Submitter Information

**Name:** Andrew Bourdon

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## General Comment

In regards to Docket DOS-2017-0046 (ITAR AmendmentCategories I, II, and III):

I support the proposed rule change. It will simplify the regulatory process by removing certain firearms that are not inherently "military grade" from the list. That will enable ITAR enforcement to be more streamlined- regulators can then focus on "real" military small arms and less on civilian friendly guns. Industry will benefit, as manufacturers and consumers will have more options in the marketplace.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93fq-fjy2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0016

Comment on DOS\_FRDOC\_0001-4527

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I would like to comment on the license fees that are currently imposed on very small businesses such as Gunsmiths and micro manufacturers of firearms components. I am not against a fee but the fee should be adjusted based on company earnings in excess of \$500,000.00 any business that falls below this figure should be permitted to purchase a yearly export/import license for less then \$500.00. Currently the BATF has adjusted license fees for the various types of FFL's issued, ITAR fees could be based on the license fees that are charged by the BATF for that businesses Type FFL. In addition perhaps a check box could be added to the renewal application of an FFL that would allow the business owner the option to purchase an Import/Export license for their business at the time of application or renewal. The option to include the Import/Export license could also be extended to the Special Occupation Tax or SOT/NFA and be based on the same fee that the BATF charges for this special Tax.

Thank you for the opportunity.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93fr-itxu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0017

Comment on DOS\_FRDOC\_0001-4527

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## Submitter Information

**Name:** Ted Ruetenik

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## General Comment

The proposal to move the responsibility for overseas gun sales from the State Department to the Commerce Department is a bad idea. Stopping guns, especially assault weapons, from getting into the wrong hands should be a top priority. Immigration to this country is already spurred on by violent drug gangs in Central America. Easing the sale of more weapons will only further the immigration and drug problems. The guns could also be used against American soldiers in future combat situations.

There is only one goal of this proposal. That is, to help the gun companies sell more guns. The potential overall costs of expanded violence and illegal immigration have not been considered. The lack of a moral compass should bother anyone involved with this issue.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93d4-cl9q Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0018

Comment on DOS\_FRDOC\_0001-4527

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## Submitter Information

**Name:** Doug Collins

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## General Comment

Anything we can do to strengthen American small business and make us more competitive on a global market are rules we need to enact now.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93hm-6j6c Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0019

Comment on DOS\_FRDOC\_0001-4527

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## Submitter Information

**Name:** Jim Ruetenik

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## General Comment

Guns are a national security risk and should be managed by the State Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93eg-mik9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0020

Comment on DOS\_FRDOC\_0001-4527

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## Submitter Information

**Name:** Ron Gablehouse

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## General Comment

Please also remove sound suppressors from the USML

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93fa-nitu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0021

Comment on DOS\_FRDOC\_0001-4527

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## Submitter Information

**Name:** WILLIAM HANGEN

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## General Comment

I support the proposed rule as written, but with a few minor changes:

1) the referenced magazine capacity restriction of 50 rounds should be doubled, to 100 rounds. There are several magazine manufacturers in the United States producing magazines of greater than 50 rounds that would benefit from this change, and such manufacture and enabling technology for magazines greater than 50 rounds is found worldwide. Limiting this magazine capacity to 50 rounds does not protect any special US or allied military advantage, but magazines of greater than 50 rounds are commonly found worldwide. Drum type magazines for the Kalashnikov family of weapons are a prime example.

2) the proposed rule does not address sound suppressors. Sound suppressors are readily available in the US and overseas, and the technical know-how to produce them is found worldwide. There are a plethora of US manufacturers fabricating sound suppressors that would benefit from this rule change, and the use of sound suppressors does not confer any special US or allied military advantage. Inclusion of sound suppressor deregulation would benefit US manufacturing interests without harming our military position.

Thank you for your time and attention regarding this matter. Have a great day!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93f0-nv6d Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0022

Comment on DOS\_FRDOC\_0001-4527

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## Submitter Information

**Name:** stephen wisher

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## General Comment

I feel that regulation of international travel with firearms should be moved to the CCL for more ease of hunting travel. Also we should reduce regulation of sound suppressors to preserve the hearing of hunters and sport shooters, so move this control to the CCL as well.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93j9-93yk Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0023

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93j9-1si8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0024

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elizabeth Evans

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93j9-9isg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0025

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jodi Paulsen

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is insane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93j9-olnr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0026

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Do not remove important export controls on non-military firearms, including handguns, semiautomatic assault rifles like the AR-15, and .50-caliber sniper rifles from your control. This change could (open) up a lot more risk and a lot more opportunity for illegal and illicit trafficking. A loosening of controls may also make it harder to identify and prosecute arms smugglers and illegal exporters.

The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more. The rule would seek to legitimize semiautomatic assault rifles as civilian products when they are, clearly, battlefield weapons.

This makes no sense at all. I object!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93j9-ghzx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0027

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93j9-coqe Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0028

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Erik Hanson

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for the U.S. gun industry. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is insane. I also cannot fathom why the rule attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have been the weapon of choice in mass shootings on U.S. soil. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93j9-lmf5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0029

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93j9-r5ka Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0030

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93j9-bscr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0031

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jeffrey Egerton

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93j9-u6kj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0032

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Suzanne Kelly

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## General Comment

I am a US citizen living in the UK, submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house. A ridiculous suggestion.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93ja-wnuo Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0033

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Faith Scimone

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93ja-vsqu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0034

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I would like to offer my comment in absolute opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. To me, this rule has profits for gun industry written all over it. Perhaps that's because the U.S. gun manufacturers are not doing well domestically. NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. I'm also disgusted by the rule's attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen the lives of so many of our fellow Americans. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93ja-walm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0035

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Becky Balser

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## General Comment

am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93jb-7xmo Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0036

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Angel Marks

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93jb-9624 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0037

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ken Koupal

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## General Comment

Please don't export arms and ammunition. Don't supply terrorists, foreign or domestic.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93jb-xsm8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0038

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93jd-zmh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0039

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is against the interests of U.S. diplomacy.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93jg-u6yo Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0040

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elizabeth Cabell

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## General Comment

I am writing to submit my comment in opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry to offset reductions in domestic sales. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change; it has not been supported by any citizen groups. It would make U.S. exports of small arms far more dangerous. Transferring oversight responsibilities to an agency that prioritizes business over national security would make U.S. exports of small arms, including semi-automatic weapons, very dangerous to other countries of the world. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which represents an unfortunate loss of oversight. I also find the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us to be appalling. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93jt-olpo Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0041

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Deborah Lattimer

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is insane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93ju-wspl Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0042

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** TONI REH

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93jv-v68k Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0043

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93jv-p10o Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0044

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Do NOT do this. How do you all live with yourselves?

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93jx-cjn1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0045

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sherrie Anonymous

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## General Comment

I am strongly opposed to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93jy-6071 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0046

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lisa McElroy

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## General Comment

I strongly oppose the proposed rule to transfer oversight of "non-military" firearms exports from the State Department to the Commerce Department. This proposal benefits the gun lobby and has come about after years of lobbying by the NRA and the NSSF. By transferring oversight responsibilities to an agency that prioritizes business over national security, this proposal would make U.S. exports of small arms more dangerous. Congress would lose its ability to oversee commercial weapons sales of \$1 million or more. This rule would also legitimize semiautomatic assault rifles, labeling them "civilian" products when these battlefield weapons have taken so many loved ones--innocent people at school, at church, at the movies, in a nightclub. This proposed rule is only in place to garner profits for the U.S. gun industry overseas--a cynical money grab that would be deadly for innocent people. Do the right thing--say no to this proposal and protect lives.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93k1-j4xq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0047

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Angel Marks

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93kc-cnwj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0048

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mark Bischoff

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## General Comment

Adjust the requirement for private individuals to travel abroad with personally owned firearms for lawful purposes such as hunting or competition. Eliminate, or provide for a citizen friendly option, to travel abroad with a firearm. The documentation of the export through the official website designed for commercial exporters is not citizen friendly. An individual traveling for a hunting trip or competition should not be regulated as an exporter.

Sound suppressors or silencers are very common among hunters and recreational shooters both in the U.S. and abroad. They do not provide the U.S. or its allies with any special military advantage. Sound suppressors and silencers should be removed from the USML.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9316-fdi1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0049

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Patrick Hiller

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## General Comment

Dear Ladies and Gentlemen,

I oppose the proposed rule for the following reasons:

1. The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. Regarding wide retail availability of firearms, about which comment has been requested, many countries, including Mexico, prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles.
2. The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.
3. National brokering laws are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. The switch from State to Commerce will mean that the brokers and financiers who arrange shipments of semiautomatic firearms will no longer have a statutory requirement to register and obtain a license, increasing risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.
4. The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators.
5. End-use controls are weakened by eliminating registration of firearms exporters, a requirement since the 1940s.
6. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those

weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

7. The Commerce Department does not have resources to enforce export controls, even before the addition of 30,000 firearms export licenses as a result of this rule predicted by Commerce. The BISs enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.

8. The proposed change will reduce transparency and reporting on gun exports.

9. This rule would transfer gun export licensing to an agency the Commerce Department - whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

10. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93lc-ez3v Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0050

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Cynthia Tuthill

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is truly horrifying. Im also opposed to the rules attempts to legitimize semiautomatic assault rifles as civilian products, when these battlefield weapons have stolen so many of our loved ones from us. Your agency must not approve this blatant corporate giveaway.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93ls-9mwm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0051

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Virginia Kenyon

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## General Comment

My name is Virginia Kenyon and I am a member of the Palo Alto Friends (Quaker) Meeting here in California. Within each of us there is an inner light and guide for how to live in the world. As Americans I believe we still have the ability to brighten the Light within for people everywhere, but these changes will do the opposite. Stop. Listen to your heart. Let everyone's Light shine.

Reasons for opposition:

The proposed rule would eliminate Congressional oversight for important gun export deals. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The switch from State to Commerce will mean that the brokers and financiers who arrange shipments of semiautomatic firearms will no longer have a statutory requirement to register and obtain a license, increasing risk of trafficking. That will make it easier for unscrupulous dealers to escape attention. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations,

End-use controls are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.



The Commerce Department does not have resources to enforce export controls. The BISs enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance. Commerce does not have these resources.

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to an agency the Commerce Department - whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.[ii] The export of these weapons should be subject to more controls, not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93md-xlkq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0052

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Hugh Fike

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## General Comment

I support the elimination of the annual \$2,250 fee required by the Department of States Directorate of Defense Trade Control (DDTC). When the Obama Administration imposed this requirement on gunsmiths who manufacture firearms and ammunition, it was done so in an attempt to drive out of business those smaller manufacturers. Additionally, this decision could capture those who are simply threading a barrel or blueprinting a gun. As a supposed pro-gun administration, I'm asking that you stand up for firearms manufacturers.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93me-nman Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0053

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Walter Bunyea

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## General Comment

An annual registration fee, of \$2,250, that manufacturers of defense items must pay, whether or not they export their products is simply unjustifiable. Please end this bad practice as soon as you can.

Applying the regime to private travelers/hunters is, well, bizarre. So please end this practice as well.

Finally, and most importantly, please put an end to any harassing or censorship of firearm instructors within the U.S, bloggers, writers, and those posting online guides or tutorials discussing "technical data" about defense items. This seems to be a clear violation of our First Amendment right to free speech. So, I urge you to cease these activities immediately.

Our Government should be protecting our rights at home and abroad, not impinging upon them.

Thank you for your consideration of our basic liberties.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93me-uxvg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0054

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** David Hawley

**Organization:** Precision Decisions

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## General Comment

This is a common sense solution. Removing gunsmiths from ITAR regulation is the only sensible answer. Gunsmiths should be allowed to perform any legal action/modification requested by a customer without having to pay fees that can exceed their profit margins in a cottage industry.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93mi-1356 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0055

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** lynn barrow

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## General Comment

I am in full agreemant with the proposed changes to ITAR. It has negatively impacted my business and forced me to withdraw my application for a Class 7 license within the last 6 months. I also would like to see suppressors moved from under current class 3 regulation.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93mj-nfr2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0056

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** William Guiette

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## General Comment

I am a small business owner, and have been a licensed firearms manufacturer for 30 years, with a special tax stamp to add Title 2 firearms (fully-automatic-"MG's"-). For 25 of those years I was licensed to manufacturer "Destructive Devices" (DD's-firearms/guns over .50 caliber including fully automatic types as well as artillery). My MG and DD manufacturing activities have always been directed at motion picture use. In order to accomplish this, I usually purchased MG or DD Parts Kits, and then manufactured the "Receiver" (the serial numbered part which is considered, by itself, to be the "Firearm"). In this way, I put together guns representing almost every country that made MG's from the 1880's to the 1980's. Many of these guns are belt-fed, and almost all of them utilize 250-rd. belts. All were used in major motion pictures over the years.

The ITAR treaty has always created a hardship for me when I had to send in \$2,250 every year just to renew my registration as a manufacturer of the above. This is supposedly a pre-condition for obtaining an export license, which is something I have never done. Any exporting of my guns for motion pictures was done by brokers (who had their own license) hired by the production companies. If the proposed ITAR revisions are going to remove my registration requirement, then I applaud that Big-time!

However, I also want to see the proposed magazine capacity limit of 50 rds. to go away, or be raised to 250 rds. This will alleviate a BIG issue which will arise over the 250-rd. belts I mentioned earlier. Motion pictures are a form of escapism, where the audience can "be there"; and producers and directors should be allowed to have available the correct props for the occasion.

William E. Guiette

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-93mk-oge8
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0057

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Theodore Greene

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## General Comment

I fully support lessening the regulatory burden on firearms manufacturers, wholesalers, retailers and other firearms support businesses (e.g., parts manufacturers, parts suppliers, parts sellers, gunsmiths, etc.) who are not involved in the international firearms business. National, State, and local businesses should not be burdened with the financial costs of unnecessary licenses, or the additional regulatory and legal restrictions that apply to those who do business internationally rather than domestically. Furthermore, even international businesses should have their legal and regulatory burdened lightened if doing so will facilitate American enterprise.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93n3-jrww Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0058

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Henry Blake

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## General Comment

The United States does not suffer from the risk of small arms attack by an outside entity at this time. The release of this technology to the world will not threaten this country. Our business's need to be able to compete with the existing trade in arms without government restriction. Doing so will keep us on the advance edge of arms development. Please reduce this regulation to the greatest extent possible.

Thank you,  
HLB

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93n9-udir Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0059

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

The current rules have had a negative impact on my business for the last five years.

As a independent gunsmith I was required to be licensed as a manufacturer in order to perform certain repairs for customers.

As a licensed manufacturer I came under the U.S. State Department. Since I do not export or do work for foreign governments and simply cannot afford the \$2200.00 annual licensing fee I have not engaged in the repairs that are considered manufacturing.

The US State Department's proposal to amend the International Traffic in Arms Regulations is a step in the right direction.

I would like to see a better clarification and distinction between "manufacturer" and "gunsmith."

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93nd-25ak Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0060

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ed Weber

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## General Comment

Eliminating the annual \$2,250 fee required by the Department of States Directorate of Defense Trade Control (DDTC) should be approved. It makes no sense to impose this fee on U.S. gunsmiths who manufacture firearms and ammunition as small businesses.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93nd-lf3l Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0061

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Raymond Crawford

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## General Comment

These regulations as currently applied cast a broad net that results in many small companies that do not export anything being forced to pay a significant sum of money to an agency that should have no oversight over domestic production of commercial firearms and firearms-related items. From the perspective of people in the firearms and gunsmithing business, this is an unabashed power and money grab by a huge agency with unlimited resources to crush any small company that does not comply with these regulations as State Department has decided to interpret them. Large corporations could not care less about more regulations and "fees" being imposed on them, they have deep pockets and armies of compliance professionals. Small businesses do care greatly. Profit margins for many of these small shops are meager to begin with. Once it was announced that very burdensome fees were going to be imposed, many businesses closed. It was not worth the hassle and expense anymore. If the aim of these regulations is to drive small companies out of business leaving only the big fish, this is being brilliantly executed. Please apply some justice and logic to these regulations. Do not demand fees from companies that do not export as they should be outside State Department's purview.

Thanks,

Raymond Crawford

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93ns-11r8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0062

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Daniel Youkilis

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## General Comment

As a close relative of someone murdered by an AR-15, I know that semi-automatic assault rifles have no civilian purpose. This proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms. These are weapons of war and their only civilian purpose is carnage. They must not be transferred to the Commerce Department control where they would not be given proper oversight.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93nu-ytb9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0063

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Logan Ward

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## General Comment

When I look at the ITAR regulations, I feel most of these regulations are unnecessary.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93os-2se8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0064

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Im 60 years old and semi-retired. I operated a gunsmith shop in my early twenties but gave it up to better support my family. However, I always intended to go back to gunsmithing later in life. Finally that happened, I spent quite a bit of money that would have funded my retirement starting my business. I had a new building built, I bought and learned to use 3 manual lathes and a mill with the intention of getting a manufacturers FFL and making a few custom firearms a year, restoring and selling a few older firearms a year and doing general repairs. I figured I would make \$5000 to \$10,000 a year to supplement my retirement while doing a job my community needed. I probably spent \$85,000 or so on my building, equipment and tools.

However, the Obama administration changed the interpretation of the ITAR rules and started requiring holders of FFL-07 licenses (manufacturing FFL) to send nearly \$3000 per year to the state department in ITAR fees. This could well have been half or more of my yearly profits and meant I had to settle for a type 01 FFL and be a gunsmith only. At that time, as a gunsmith I could do nearly any repair, customization or improvement for a customer on his/her firearm but could not improve, customize or refinish a firearm and then sell it as that would make me a manufacturer. Although this wasnt the future Id worked towards for nearly 40 years, it was better than nothing.

Then, in July of 2016 the Obama administration again reinterpreted the existing rules and decided to bring virtually all the jobs gunsmiths do under the ITAR umbrella. This was obviously intended to bankrupt the nations gunsmiths, and, I suspect to chill pre-election free speech. It did not suppress my free speech but it did cause me to start turning away 90% of my potential customers. Under these rules refinishing firearms and replacing parts is about the only thing a gunsmith is now allowed to do. According to the 2nd Obama reinterpretation of the ITAR rules even making a screw or stock for a 150 year-old firearm could be interpreted as a violation.

Since these rules took effect in July of 2016 I dont believe I have made a monthly profit, even once. Threading barrels, customizing, making stocks, dovetailing sight grooves, re-chambering, making obsolete parts and the like are all still banned to my knowledge. And, with the exception of the occasional

machine shop work, my three lathes and my mill are still idle.

I am again considering closing my shop because of this. My insurance alone is nearly a grand a year and Im not sure how long I can survive while waiting on this to be fixed. Please, lets get the State Department out of the gunsmith business and again allow a gunsmith to make and sell a few custom firearms a year without being bankrupted by ITAR.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93p7-gxey Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0065

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Brad Krug

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## General Comment

Please reverse Obama's Executive order that makes small home based gunsmithing activities subject to the registration and tax payment of at least \$1250 per year for activities as minimal as making a small spring. It was a last minute decision by Obama to put an un-affordable burden, defined as a tax on small business.

This order was unfair and unnecessary, and another overstep of authority by an anti-2nd amendment President.

Thank You

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93pn-lpfq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0066

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Paul Washart

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## General Comment

I oppose the proposed rule on gun exports because. Proposed rule treats semi-automatic assault rifles as non-military But US troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles & handguns, as well as of any larger caliber firearm. Many semi-automatic rifles are also easily converted to fully automatic. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate export of arms & would eliminate Congressional oversight for gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons which limits its ability to comment on related human rights concerns, as it recently did on the Philippines & Turkey. Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. In a September 15, 2017, letter, Senators Ben Cardin, Dianne Feinstein, & Pat Leahy explicitly noted that this move would violate Congressional intent & effectively eliminate Congress proper role. New rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the taxpayers will absorb the cost of reviewing applications and processing licenses not the gun exporters that benefit from these sales. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention. Rule would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. Transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database,



weakening enforcement against arms trafficking.

Rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. Unless corrected, the new regulations run the risk of effectively enabling 3D printing of firearms in US & globally. By eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could be State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources. Proposed change will reduce transparency and reporting on gun exports by eliminating Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to an agency Commerce Department - whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. Export of these weapons should be subject to more controls, not less.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93pp-8ngt Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0067

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** nan logan

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## General Comment

I am concerned that international gun sales might be prosscessed through commerc rather than State.  
Please do what youcan to keep these sales under the State Department's perview.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93pq-gj42 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0068

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Heidi Fox

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## General Comment

I am in strong opposition to the proposed changes in the rules for international trafficking of arms. I was alerted to this proposed rule change by organizations who advocate for sensible gun control legislation domestically. Until we can agree on the definition and categorization of weapons designed for mass destruction and control their production and use domestically, we should not be modifying rules for the oversight of arms manufactured and distributed internationally. These rule changes are one of many ways that ordinary citizens who advocate for broader and stricter gun control are undermined by special interests who know where to target their efforts to relax the definition of weapons designed for war. In light of the recent efforts by the Justice Department to limit those seeking asylum from dangers in their homeland, the change in the rules is as much an immigration issue as it is an arms control issue.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93op-zrcw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0069

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Im 60 years old and semi-retired. I operated a gunsmith shop in my early twenties but gave it up to better support my family. However, I always intended to go back to gunsmithing later in life. Finally that happened, I spent quite a bit of money that would have funded my retirement starting my business. I had a new building built, I bought and learned to use 3 manual lathes and a mill with the intention of getting a manufacturers FFL and making a few custom firearms a year, restoring and selling a few older firearms a year and doing general repairs. I figured I would make \$5000 to \$10,000 a year to supplement my retirement while doing a job my community needed. I probably spent \$85,000 or so on my building, equipment and tools.

However, the Obama administration changed the interpretation of the ITAR rules and started requiring holders of FFL-07 licenses (manufacturing FFL) to send nearly \$3000 per year to the state department in ITAR fees. This could well have been half or more of my yearly profits and meant I had to settle for a type 01 FFL and be a gunsmith only. At that time, as a gunsmith I could do nearly any repair, customization or improvement for a customer on his/her firearm but could not improve, customize or refinish a firearm and then sell it as that would make me a manufacturer. Although this wasnt the future Id worked towards for nearly 40 years, it was better than nothing.

Then, in July of 2016 the Obama administration again reinterpreted the existing rules and decided to bring virtually all the jobs gunsmiths do under the ITAR umbrella. This was obviously intended to bankrupt the nations gunsmiths, and, I suspect to chill pre-election free speech. It did not suppress my free speech but it did cause me to start turning away 90% of my potential customers. Under these rules refinishing firearms and replacing parts is about the only thing a gunsmith is now allowed to do. According to the 2nd Obama reinterpretation of the ITAR rules even making a screw or stock for a 150 year-old firearm could be interpreted as a violation.

Since these rules took effect in July of 2016 I dont believe I have made a monthly profit, even once. Threading barrels, customizing, making stocks, dovetailing sight grooves, re-chambering, making obsolete parts and the like are all still banned to my knowledge. And, with the exception of the occasional

machine shop work, my three lathes and my mill are still idle.

I am again considering closing my shop because of this. My insurance alone is nearly a grand a year and Im not sure how long I can survive while waiting on this to be fixed. Please, lets get the State Department out of the gunsmith business and again allow a gunsmith to make and sell a few custom firearms a year without being bankrupted by ITAR.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-93qd-m69y
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0070

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Maria Carla Condori Bazan

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93qr-gnfz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0071

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Diane Pasta

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## General Comment

I am Diane Pasta, a Quaker (Religious Society of Friends). As a person of faith and a citizen of the US, I am concerned about gun violence and militarization, which makes everyone less safe.

I oppose the proposed rule for the following reasons:

1. The proposed rule treats semi-automatic assault rifles as "non-military." But many state and non-state groups use semi-automatic rifles in armed conflicts. We should prohibit civilian possession of semi-automatic rifles and handguns, and larger caliber firearm. Semi-automatic rifles are easily converted to fully automatic firearms. These weapons have substantial military utility, so transfer of these firearms to Commerce Dept. control is inconsistent with Congressional attempts to regulate the export of arms.
2. The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons, limiting its ability to comment on related human rights concerns. Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress' proper role.
3. The switch from State to Commerce will mean that the brokers and financiers who arrange shipments of semiautomatic firearms will no longer have a statutory requirement to register and obtain a license, increasing risk of trafficking.
4. The rule reduces end-use controls for gun exports. It would eliminate the State Department's Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Government's information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators.
5. End-use controls are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporter's history. But the transfer of licensing to Commerce will remove new exporters and brokers from the State Department database, weakening enforcement against arms trafficking.
6. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of weapons. We can't have everyone with access to a 3D printer, anywhere, entitled to

produce a lethal weapon. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms. It is effectively eliminating many means to do background checks on domestic sales and end-use controls on international exports.

7. The Commerce Department does not have resources to enforce export controls, even before the addition of 30,000 firearms export licenses as a result of this rule predicted by Commerce. The BIS's enforcement office, with no staff in many parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.

8. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

9. This rule would transfer gun export licensing to an agency - the Commerce Department - whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

10. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control are weapons of choice for criminal organizations in countries that have increased violence. The export of these weapons should be subject to more controls, not less.

Thank you for the opportunity to comment on this important matter.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93r0-sye5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0072

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michele Hunn

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## General Comment

As a parent and member of the Radnor Network to Prevent Gun Violence, I am against this proposed rule. This group was formed by a group of parents after the Parkland terrorist attack who want to help reduce gun violence. Exporting these dangerous weapons is not something we should do. There is too much gun violence in America and it is much safer in other democratic countries in Europe and Asia. And we don't need these weapons to be used against our soldiers and other citizens overseas.

I oppose the proposed rule for the following reasons:

Treats semi-automatic assault rifles as "non-military", despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Dept's Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

Please see attached for more detail.

Thank you for your consideration.



## **Attachments**

Oppositon to Gun Exports

Also I oppose the proposed rule for the following reasons:

-The proposed rule treats semi-automatic assault rifles as “non-military.” But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

-The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress’ proper role.

-The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government — i.e., taxpayers — will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[3]

-The rule reduces end-use controls for gun exports. It would eliminate the State Department’s Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Government’s information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporter’s history whenever a

manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

-The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

-The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.[4] The BIS's enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.

-The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

-This rule would transfer gun export licensing to an agency – the Commerce Department – whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.[5] The export of these weapons should be subject to more controls, not less.

Michele Hunn

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93r1-7vsh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0073

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** James Samuel

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## General Comment

I enter this comment in strong support of the rule changes as it would help small manufacturers and individuals innovate and develop technologies and products to make firearms safer, less expensive, more tailored to individual uses/needs, and of better overall quality. The current rules are stagnating individuals that wish to develop ideas in relation to firearms through intentionally burdensome fees and application structures in an attempt to weaken the firearms industry's best source of ideas. Americans sitting at their workbench at home that see a need and fill a need. I would also ask that the rules on suppressors be relaxed in this process as well if possible as they offer no military or tactical advantage and are merely hearing protection devices, the equivalent to the muffler on a car, that protect Americans from injury, not improvements to the function or performance of any firearm as opponents have falsely stated for too many years. Thank you for considering this comment and pushing forward the rule changes.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93r8-f2cf Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0074

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Phil Steinschneider

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## General Comment

Amendments to the International Traffic in Arms Regulations are very welcome. As a Type 01 Federally Licensed Firearms dealer, our company has been waiting for this change to happen for several years. It will allow us to expand our operations into manufacturing and export, which will potentially make it possible for us to create new jobs and new opportunities for workers within our company, as well as the various vendors that supply us.

On the other hand, several proposed changes fall short of what we were expecting.

Why are suppressors not being placed on the CCL? These are in common use throughout the United States and in Europe. In some European countries, silencers are not regulated at all, or much less regulated than in the US. Put suppressors on the CCL in order to stimulate innovation among US-based manufacturers. This makes even more sense if suppressors are eventually removed from the National Firearms Act, which is quite possible in the future.

Although automatic weapons are no longer in common use by civilians, this is only due to the Hughes Amendment of the Firearm Owners Protection Act of 1986. This amendment has never been challenged, but is certainly unconstitutional.

It makes no sense to continue leaving firearm technologies that have been around for over 100 years under ITAR. This appears to be a political decision rather than a logical one. Move common automatic weapons to the CCL.

Due to their heavily-regulated nature, automatic firearms will be still difficult to export. Leaving them under ITAR will only hurt the US, as it will continue to constrain less well-heeled small arms manufacturers, who might develop the next Thompson SMG, M1 Garand, or M16. Does no one wonder why automatic firearm technology has been at a standstill essentially for over 60 years?

All of Category I should be moved to the CCL. Items of likely greater concern fall under Category II and Category III. The revisions to those sections will of course depend on the items enumerated in the

changes.

As a Type 01 FFL, we are looking forward to these reforms in order to acquire a Type 07 license. Because we are a small concern, the ITAR fee has have been a barrier to entry for us. We will still feel constrained by the omission of suppressors and commonly-available automatic weapons from these changes, however. If these had been placed on the CCL, we would have become a Type 07/SOT. Under the current proposal, an 07/SOT will be required still to pay the ITAR fee.

These rules have always been complex, so simplification and clarification are appreciated. Those who would violate them will do it despite these regulations, however. The only companies that benefit from any remaining complex technologies not moved to the CCL are those with the capital and resources to hire entire compliance departments at the expense of productive activity. The time and money wasted complying with ITAR could be so much more effectively used for the development of new technologies and new jobs for Americans.

Nonetheless, these changes are certainly welcome, and will go a long way to help make the American defense industry more competitive in the worldwide defense article marketplace.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93rk-qnr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0075

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** peter dobrzanski

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## General Comment

Small arms and the term 'manufacturing' should be removed from ITAR control. As a gunsmith it has adversely effected my business as to what I can and can not do. For some unknown reason, in the eyes of ITAR regulations, I was considered to be a 'manufacturer' on the world stage allegedly exporting war items to other countries. When in fact, I was just threading muzzles for hunting rifles.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93rm-vbr3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0076

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Deborah Massa

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## General Comment

Please do not give up your responsibility for overseas gun sales to the commerce department. This makes absolutely no sense at all unless we want to become known as the United States of weapons profiteers.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93se-4nuj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0077

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Alexa Tomassi

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## General Comment

To: Secretary of State Mike Pompeo  
Secretary of Commerce Wilbur Ross

We urge you to reverse the proposed regulations that will make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere. We have seen the effects of these weapons in U.S. shootings, and know they are used around the world to kill and attack hundreds of people every day in violent crime, wars, and political violence. U.S. export controls for weapons used in violence should be made stronger, not weaker.

Sources:

[1] The Washington Post, "The Trump administration wants to make it easier to sell U.S. guns abroad. Here's what you need to know" June 4, 2018. [https://www.washingtonpost.com/news/monkey-cage/wp/2018/06/04/the-trump-administration-wants-to-make-it-easier-to-sell-u-s-guns-abroad-heres-what-you-need-to-know/?utm\\_term=.cdb39dd2a669](https://www.washingtonpost.com/news/monkey-cage/wp/2018/06/04/the-trump-administration-wants-to-make-it-easier-to-sell-u-s-guns-abroad-heres-what-you-need-to-know/?utm_term=.cdb39dd2a669)

[2] Salon, "U.S. gun industry wants a bigger piece of the world's arms trade," June 1, 2018. <https://www.salon.com/2018/06/01/u-s-gun-industry-wants-a-bigger-piece-of-the-worlds-arms-trade/>

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93sg-lbtv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0078

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Henry Fairman

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93sg-etzf Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0079

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Amy Welsh

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As gun violence continues to tear lives apart at an alarming rate, we need tougher gun controls now more than ever. The U.S. needs to be proactive in their approach, especially when global security is such an issue. At this point, we're not even being reactive.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93sg-mdrh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0080

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Katherine Dru

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93sg-ah2t Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0081

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lauren Bopp

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## General Comment

Export license oversight for firearms should remain with the State Department. The proposed rule to move it to Commerce is short-sighted and will only aggravate the crisis we have in this country surrounding firearm deaths. We also must not take away valuable tools that law enforcement have to fight organized crime and terrorism across borders.

I also strongly oppose transferring the cost of processing licenses from gun manufacturers to taxpayers and removing blocks on the 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. This rule only makes sense if you put the profits of gun manufacturers ahead of public safety and the safety of our police and border agents--in other words, no sense at all.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93sg-mq0o Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0082

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** melissa mellen

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93sh-bcpo Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0083

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Gerald MacKay

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93sh-duam Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0084

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93sh-x9j5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0085

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93sh-zbl9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0086

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Abigail B Sivan

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93sh-hsjd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0087

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Ann O'Connor

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer. More people are being killed and/or terrorized by these weapons. We need to seek a more peaceful world, and this proposal will work against that effort.

Thank you for considering this.

Mary Ann O'Connor

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93sh-6gbp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0088

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Chris Jones

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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